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November 1, 2012

Ohio Environmental Protection Agency
Division of Emergency and Remedial Response
Voluntary Action Program
2110 East Aurora Road
Twinsburg, Ohio 44087

Attention: Mr. Kevin Palombo, Ohio EPA, DERR Project Coordinator

Reference: Volunteer's Agreement to Comply Form 5 and Initial Eligibility Determination Form 7 for the RCRA and VAP MOA Track
Canton Drop Forge Southway Property

Dear Mr. Palombo:

As you are aware, TRC Environmental Corporation (TRC) has been engaged by Canton Drop Forge, Inc. (CDF) to provide services of an Ohio EPA Voluntary Action Program (VAP) Certified Professional (CP) for the CDF property located at 4575 Southway Street SW, Canton, Ohio (Canton Drop Forge Southway Property). Notice of Entry into the RCRA and VAP MOA Track and documentation of public notice was provided to Ohio EPA in previous correspondences. As required for the RCRA and VAP MOA Track, TRC is providing on behalf of the volunteer (CDF) the "Volunteer's Agreement to Comply" and "Initial Eligibility Determination," Forms 5 and 7, respectively. Please find these forms attached to this letter.

If you have any questions or require additional information you may reach me at (216) 344-3072 (kteuscher@trcsolutions.com) or Mr. Donald A. Fay (Certified Professional) at (513) 489-2255 (dfay@trcsoluctions.com).

Respectfully,

TRC Environmental Corporation

Kathleen R. Teuscher

Kathleen R. Teuscher
Risk Assessor/Project Manager

Enclosures: Form 5 (Volunteer's Agreement to Comply)
Form 7 (Initial Eligibility Determination)

cc: Ohio EPA-DERR/VAP Records Management Officer
Sean Denman, CDF
Canton Drop Forge Southway Property Repository

12-1042LTR/sap

FORM #5

Ohio EPA RCRA and RCRA AND VAP MOA Track:

Notice of VAP Technical Assistance Program and

Volunteer's Agreement to Comply

The establishment of the *RCRA and Voluntary Action Program Memorandum of Agreement* between the United States Environmental Protection Agency ("USEPA") and the Ohio Environmental Protection Agency ("Ohio EPA"), effective November 8, 2007 (the "RCRA and VAP MOA Track") was an administrative effort which required no change to program rules or statute. The RCRA and VAP MOA supersedes the VAP MOA effective July 31, 2007 which similarly required no rule or statutory changes. Because of this, it was determined that the "up-front" oversight required under the RCRA and VAP MOA Track (i.e., Ohio EPA's review of eligibility determinations, Phase I property assessments, risk assessments, etc.), would be conducted under Ohio EPA's VAP Technical Assistance Program. Further, volunteers must agree to this and other RCRA and VAP MOA Track procedures in accordance with the MOA. This form provides an overview of the Technical Assistance Program, and overview of the MOA requirement for the volunteer's agreement to comply with RCRA AND VAP MOA Track procedures, and the attached template: *Acknowledgment of Volunteer's Agreement.*

Overview of Technical Assistance Program

Under the conventional or "Classic" VAP Track, Ohio EPA is not required to review any documentation pertaining to a voluntary action until, at the completion of the assessment and cleanup, a no further action ("NFA") letter for the property is submitted to the Director of Ohio EPA. In order to address the issue of volunteers and certified professionals who seek property-specific technical guidance from Ohio EPA in the largely privatized Classic VAP Track, Ohio EPA established a Technical Assistance Program. Ohio EPA's staff time spent providing technical assistance related to a voluntary action is billed to the volunteer (or person requesting the technical assistance). The charge for technical assistance is based on the hourly rate of the Ohio EPA staff member(s) providing the assistance plus fringe and overhead. For information about the average hourly rates, please see "How to Estimate Average Cost of VAP Technical Assistance", under the Technical Assistance section of the VAP web page, www.epa.ohio.gov/portals/30/vap/docs/billable.pdf.

All oversight that is required to be conducted under the RCRA and VAP MOA Track will be conducted under the VAP Technical Assistance Program. Therefore, Ohio EPA will bill volunteers (or person requesting the technical assistance) for the time agency staff spend conducting the oversight and reviews related to the RCRA and VAP MOA Track for the property.

To help estimate the costs the volunteer will incur for Ohio EPA's RCRA and VAP MOA Track reviews and oversight, please refer to the *average* review times listed below. Please understand that these are average amounts of time to conduct document reviews in the Technical Assistance Program (actual review times in the RCRA and VAP MOA Track will vary depending on the complexity of the property, thoroughness of the work product, etc.).

Ohio EPA Review Conducted	Average Time for Review
Initial Investigation	60-90 hours
Phase II Assessment, including Applicable Standards Determination	40-80 hours
Risk Assessment	30-80 hours
Remedial Action Work Plan / O&M Plan	50-100 hours
Total Hours (*on average*)	180-350 hours (mean of 265 hours)

Volunteers which are a public entity (e.g, city, county or port authority) may qualify for grant-funded technical assistance to cover costs of Ohio EPA's oversight under the RCRA AND VAP MOA Track. Contact Ohio EPA, Central Office VAP staff at 614-644-2924 for more information on grant-funded technical assistance and to obtain a sample request letter.

* *

Agreement to Comply with RCRA AND VAP MOA Track Procedures

To successfully complete a voluntary action under the RCRA and VAP MOA Track, a volunteer must demonstrate that the voluntary action meets the applicability requirements of the MOA. According to section IV of the MOA, the MOA applies to properties that meet all of the following criteria:

(1) The participating volunteer provided a *Notice of Entry into the RCRA and VAP MOA Track* (*RCRA and VAP MOA Track Form #3*) to Ohio EPA before the volunteer began activities under the program;

(2) The participating volunteer agreed to follow the procedures provided under the RCRA and VAP MOA Track and to remain in compliance with those procedures (*RCRA and VAP MOA Track Form #1*) before the volunteer began activities under the program;

(3) The participating volunteer completed the voluntary action in compliance

with the RCRA and VAP MOA Track procedures, ORC Chapter 3746 and OAC Chapter 3745-300, and received a covenant not to sue, that is still in effect, from the State of Ohio; and

(4) The participating volunteer demonstrated that the property is not ineligible (*RCRA and VAP MOA Track Form #7*).

Therefore, to participate in the RCRA and VAP MOA Track, a volunteer must submit a completed *Notice of Entry into the RCRA and VAP MOA Track*, demonstrate that the property is eligible, and execute the attached *Volunteer's Acknowledgment of Agreement*.

By signing the Acknowledgment before a notary public, the volunteer participating in the RCRA and VAP MOA Track acknowledges the volunteer's agreement to follow the procedures provided under the RCRA and VAP MOA Track (outlined in *RCRA and VAP MOA Track Form #1*) and remain in compliance with those procedures in conducting the voluntary action. The participating volunteer also acknowledges its agreement to reimburse Ohio EPA for its technical assistance costs. Keep in mind that the volunteer reserves the right to withdraw from the RCRA and VAP MOA Track at any time prior to submission of a no further action letter for the Property provided that Ohio EPA is given written notice of the withdrawal within 14 days after the withdrawal.

Further, the volunteer acknowledges its agreement to allow Ohio EPA and USEPA access to the property to conduct site visits or other visual inspections of the property for purposes of overseeing the voluntary action under the RCRA and VAP MOA Track. In cases where the volunteer is not a property owner or operator, but otherwise has made arrangements with the property owner allowing access for state and federal government oversight purposes, the volunteer may indicate the access arrangement. To the extent the volunteer lacks authority to provide Ohio EPA or USEPA access for oversight of the voluntary action, the agreement requires the Volunteer's best efforts to obtain such access from the property owner.

FORM #5

ACKNOWLEDGMENT OF VOLUNTEER'S AGREEMENT

The *RCRA and Voluntary Action Program Memorandum of Agreement* between the Ohio Environmental Protection Agency ("Ohio EPA") and the United States Environmental Protection Agency ("USEPA"), effective November 8, 2007 (the "RCRA and VAP MOA Track") was an administrative effort which required no change to program rules or statute. The RCRA and VAP MOA supersedes the VAP MOA effective July 31, 2007 which similarly required no rule or statutory changes. The MOA requires that participating volunteers agree to comply with the procedures provided under the RCRA and VAP MOA Track and to remain in compliance with those procedures. This requirement is met through this form: *Acknowledgment of Volunteer's Agreement.*

Compliance with RCRA and VAP MOA Track Procedures: By signature to this agreement, Canton Drop Forge, Inc. *(name of RCRA and VAP MOA Track Volunteer)* (the "Volunteer") agrees to follow the procedures provided under the RCRA and VAP MOA Track (as outlined in *RCRA and VAP MOA Track Form #1*). The Volunteer agrees to remain in compliance with those procedures for the Canton Drop Forge Southway Property *(name)* property identified in the *Notice of Entry Into the RCRA and VAP MOA Track* submitted on September 5, 2012 *(date)* (the "Property") until submission of a no further action ("NFA") letter issued for the Property in accordance with Ohio Revised Code ("ORC") 3746.11 and Ohio Administrative Code ("OAC") Chapter 3745-300.

VAP Technical Assistance Program and Ohio EPA Oversight: By signature to this agreement, Canton Drop Forge, Inc. *(name of Volunteer or other person agreeing to pay for technical assistance)* agrees to reimburse Ohio EPA its actual costs related to RCRA and VAP MOA Track oversight of the Property, including those costs incurred in conducting document reviews, site visits, and other activities necessary to complete the RCRA and VAP MOA Track. Ohio EPA's invoices for technical assistance costs should be mailed or directed to: Sean Denman, Health & Safely Director *(name, job title, of contact person with Volunteer / payor)*, at 4575 Southway St. SW, Canton, Ohio 44706 *(address)*. *[Note:* If the Volunteer is a public entity and is requesting grant-funded technical assistance to cover RCRA and VAP MOA Track oversight costs, submit with this Agreement the Volunteer's request letter for grant-funded technical assistance.*]*

Duration of Agreement; Withdrawal: The RCRA and VAP MOA Track begins upon submission of a Notice of Entry (*RCRA and VAP MOA Track Form #3*) and ends upon submission of an NFA letter issued in compliance with ORC Chapter 3746 and the rules adopted thereunder in OAC Chapter 3745-300. The Volunteer reserves the right to withdraw from the RCRA and VAP MOA Track at any time prior to submission of a no further action letter for the Property. If the Volunteer withdraws the Property from the RCRA and VAP MOA Track, the Volunteer agrees to provide Ohio EPA written notice of the withdrawal within 14 days after the withdrawal.

FORM #5

Consent to access: The Volunteer, as owner or operator of the Property, consents to Ohio EPA, USEPA and their respective representatives entering the Property during reasonable hours. *[Alternate provision for use when the Volunteer is not an owner or operator of the Property, but has already secured access for state or federal oversight under the RCRA and VAP MOA Track*: The owner of the Property is Canton Drop Forge, Inc. (*name of Property owner*), who through an access agreement with the Volunteer agrees to provide access to Ohio EPA, USEPA and its respective representatives for the purposes of overseeing the voluntary action under the RCRA and VAP MOA Track.*] -or- [Alternate provision for use when the Volunteer is not an owner or operator of the Property and does not yet have Property owner's consent to access:* The owner of the Property is _____(*name of Property owner*). The Volunteer agrees to use best efforts to secure access from the Property owner for the purposes of this agreement. The Volunteer agrees to contact Ohio EPA once consent to access is obtained.*]*

The consent to access for the purposes of this agreement extends to site visits or other visual inspections of the Property related to Ohio EPA or USEPA oversight of the voluntary action at the Property. By giving consent under this agreement, the Volunteer does not waive or otherwise compromise the Volunteer's rights under federal, state or local law.

It is so agreed:

_____
(Signature)

BRAD AHBE, authorized representative of CANTON DROP FORGE
(Printed/typed name) (Name of Volunteer)

Acknowledgment

Before me, a Notary Public, appeared the above-named individual who acknowledged signing of the foregoing Agreement to be his / her own free act.

In testimony whereof, I have hereto subscribed my name and affixed my seal this 26 day of September, 2012.

Lynda Vosick
(Signature)

LYNDA VOSICK
(Typed/printed name)
Notary Public; my commission expires on 11/14, 2015.

LYNDA VOSICK
NOTARY PUBLIC, STATE OF OHIO
TUSCARAWAS COUNTY
My Commission Expires 11/14/2015

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
NPL	1. OAC 3745-300-02(B)(1); National Priority List (NPL) sites		
NPL	1a. Is the property or some portion of the property (i) on the NPL, or (ii) proposed to be listed on the NPL according to Federal Register notice, or (iii) a site where U.S. EPA, after performance of a preliminary assessment or site inspection and after consultation with Ohio EPA, determines or has determined that the site obtains a preliminary score sufficient for possible listing on the NPL. (If only a portion of the property is affected by one or more of the above criteria, attach a map that identifies the portion of the property affected.)	Yes: No: ✓	
	Note: Properties or portions thereof that are listed on the NPL are ineligible for the MOA Track, until U.S.EPA delists the property or portion thereof from the NPL, and Ohio EPA is provided documentation of the delisting. Properties or portions thereof that are proposed to be listed on the NPL or are the subject of a Hazard Ranking Scoring package, are ineligible for the MOA Track, unless U.S. EPA determines not to list the property or portion thereof or determines not to take further federal action, and Ohio EPA is provided documentation of the determination.		
NPL	1b. If YES to 1.a.), has U.S.EPA delisted, determined not to list, or determined not to take any further federal action at the property or portion of the property?	Yes: No:	
NPL	1c. If YES to 1.b.), provide the date of the delisting or the determination not to list or take further federal action, and attach documentation of the delisting.		Date delisted / determination by U.S. EPA: Document name: Section: Page Number(s):
NPL	1d. If NO to 1 b.), the property or portion thereof may be ineligible for the VAP MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
UIC	2. OAC 3745-300-02(B)(2) Underground Injection Control wells		
UIC	2a. Has there ever been an "injection well" as defined in OAC 3745-34-01(MN) located on the property?	Yes: No: ✓	
	Note: Properties on which a Class I, II, III, or IV injection well is located are not eligible for the VAP unless all closure and/or remediation obligations are satisfied, and Ohio EPA receives documentation of completion of those requirements.		

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
UIC	2.e. If NO to 2.c.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		UIC
UIC	2.f. For each well identified as Class II, was closure and remediation pursuant to ORC Chapter 1509 completed for which ODNR issued approval?	Yes: No:	UIC
UIC	2.g. If YES to 2.f.) provide the date of the closure approval and attach documentation of the closure approval.		UIC
UIC	2.h. If NO to 2.f.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
UIC	2.i. For each well identified as Class III, was closure and remediation pursuant to OAC Chapter 1509 completed at the property for which ODNR issued approval?	Yes: No:	
UIC	2.j. If YES to 2.i.), provide the date of closure approval and attach documentation of the closure approval.		Date: Document name: Section: Page Number(s):
UIC	2.k. If NO to 2.i.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
UIC	2.l. For each well identified as Class IV was closure and remediation pursuant to ORC Chapter 3734 conducted, and the closure and remediation approved of by Ohio EPA?	Yes: No:	
UIC	2.m. If YES to 2.l.), provide the date of closure approval and attach a copy of the		Date: Document name: Section:

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
	closure approval documentation.		Page Number(s):
UIC	2.n. If NO to 2.l.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
UIC	2.o. For any well identified as Class V, does a permit or order issued by Ohio EPA or U.S.EPA require site assessment, removal or remediation?	Yes: No:	Document name: Section: Page Number(s):
	Note: Properties on which Class V injection wells are located and which are subject to a permit and/or order requiring investigation or remediation are not eligible for the MOA Track, unless all obligations of the permit and/or order are satisfied, and Ohio EPA receives documentation of completion of those requirements.		
UIC	2.p. If YES to 2.o.), has all work under the order or permit been completed satisfactorily and has the order or permit been terminated?	Yes: No:	
UIC	2.q. If YES to 2.p.), provide the date of the termination documentation and attach a copy of the termination documentation.		Date: Document name: Section: Page Number(s):
UIC	2.r. If NO to 2.p.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
RCRA CA Permit	4. OAC 3745-300-02(B)(3) RCRA Corrective Action Permit		
RCRA CA Permit	4.a. Is the property subject to any state or federal obligations to perform corrective action pursuant to a permit issued under RCRA or ORC Chapter 3734, and rules adopted thereunder?	Yes: No: ✓	
	Note: If a property is subject to a federal corrective action order, it is ineligible pursuant to OAC 3745-300-02(B)(4) and the MOA, until the obligations of the order are satisfied, and Ohio EPA receives documentation of completion of those requirements. If a property is subject to a state corrective action order, it is ineligible pursuant to OAC 3745-300-02(B)(3) (see below).		
RCRA CA Permit	4.b. If YES to 4.a.), has all work under the permit been completed satisfactorily and the permit been terminated?	Yes: No:	
RCRA CA	4.c. If YES to 4.b), provide the date of termination letter and attach a copy of the		Date: Document name: Section:

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
Permit	termination letter.		Page Number(s):
RCRA CA Permit	4.d. If NO to 4.b), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility. Reference the location within the NFA Letter where a concise explanation of the property's favorable eligibility is located.		Document name: Section: Page Number(s):
PCBs	5. OAC 3745-300-02(C)(8) Polychlorinated Biphenyls ("PCBs")		
PCBs	5.a. Has a release of PCBs in excess of fifty (50) parts per million (ppm) ever occurred at the property?	Yes: No: ✓	
	Note: Properties or portions thereof upon which a release of PCBs in excess of 50 ppm has occurred are ineligible for the VAP, unless all applicable obligations of Toxic Substances Control Act (TSCA) have been satisfied, and Ohio EPA receives documentation of completion of those requirements.		
PCBs	5.b. If YES to 5.a.), provide the date(s) of the release(s).		Date(s):
PCBs	5.c. If any release occurred, has removal or remediation pursuant to TSCA been completed at the property, and approval issued by U.S. EPA?	Yes: No:	Document name: Section: Page Number(s):
PCBs	5.d. If NO to 5.c), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
Fed Enf	6. OAC 3745-300-02(B)(4) Federal Enforcement		
Fed Enf	6.a. Has the property, or any portion thereof, ever been the subject of a RCRA or CERCLA federal enforcement action which required any site assessment, removal, or remedial activities, pursuant to any federal laws or regulations?	Yes: No: ✓	
	Note: Properties which are subject to a RCRA or CERCLA federal enforcement action, including but not limited to administrative or judicial orders, injunctions, consent decrees, or CERCLA special notice letters, are ineligible for the MOA Track, until all obligations of the federal enforcement action are satisfied, and Ohio EPA receives documentation of completion of those requirements.		
Fed Enf	6.b. IF YES to 6.a.), has all work under the federal enforcement action been completed satisfactorily and the enforcement action	Yes: No:	Document name: Section: Page Number(s):

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
	terminated?		
Fed Enf	6.c. If YES to 6.b.), provide date of termination letter and attach a copy of the letter of termination.		Date: Document name: Section: Page Number(s):
Fed Enf	6.d. If NO to 6.b.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
Solid Waste	7. OAC 3745-300-02(B)(5) Solid Wastes		
Solid Waste	7.a. Was "solid waste", as defined in ORC Chapter 3734 and rules adopted thereunder, disposed of on the property after 1968?	Yes: ✓ No:	
	Note: Properties which are subject to solid waste closure and post-closure activities under ORC Chapter 3734 and the rules adopted thereunder, are ineligible for the VAP, until all obligations of solid waste closure and post-closure are satisfied, and Ohio EPA receives documentation of completion of those requirements.		
Solid Waste	7.b. If YES to 7.a.), is the solid waste disposal (or solid waste facility) subject to closure pursuant to a permit, license or order issued pursuant to ORC chapter 3734?	Yes: ✓ No:	
Solid Waste	7.c. If YES to 7.b.), did Ohio EPA approve of completion of the closure?	Yes: ✓ No:	
Solid Waste	7.d. If YES, to 7.c.), provide the date of the closure approval and attach a copy of the closure approval letter.		Date: "Canton Drop Forge & Manufacturing closed the landfill in 1979 because it had reached its capacity. Zone A was closed in October 1978, and Zone B in 1979" per Findings of USEPA Screening Site Inspection Report, Ecology & Environment Inc. (April 8, 1991). Section: Section 2 Page Number(s): page 2-3 See Attachment 1
Solid Waste	7.e. If YES to 7.c.), have all post-closure obligations been met at the closed disposal facility?	Yes: ✓ No:	
Solid Waste	7.f. If YES to 7.e.), attach documentation of Ohio EPA's approval of completion of the post-closure obligations.		Document name: Directors Final Findings Orders Section: NA Page Number(s): See Attachment 2 (10/15/1981), granting exemption and authorizing additional disposal in landfill.

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
Solid Waste	7.g. If NO to 7.c.), or 7.e.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
Solid Waste	7.h. Does the property contain any foundry sand, fly ash, bottom ash, slag, or construction and demolition debris that is not solid waste, as defined by ORC 3734.01?	Yes: ✓ No:	
Solid Waste	7.i. If YES to 7.h., attach documentation that supports the material is not solid waste as defined by ORC 3734.01.		Document name: Directors Final Findings Orders (10/15/81) Section: See Attachment 2 Page Number(s): See Attachment 2 Document name: Analytical Report (1979) Section See Attachment 3 Page Number(s): See Attachment 3
Haz Waste	8. OAC 3745-300-02(B)(5) Hazardous Wastes		
Haz Waste	8.a. Did treatment, storage, or disposal of a hazardous waste, as defined in ORC Chapter 3734 and the rules adopted thereunder, occur at the property on or after November 19, 1980?	Yes: No: ✓	
	Note: Properties which are subject to hazardous waste closure and post-closure activities under ORC Chapter 3734 and the rules adopted thereunder, are not eligible for the MOA Track, until all obligations of hazardous waste closure and post-closure are satisfied, and Ohio EPA receives documentation of completion of those requirements.		
Haz Waste	8.b. Have soils or other environmental media been removed from the area of contamination and placed in other locations on the property?	Yes: No: ✓	
Haz Waste	8.c. If YES to 8.b.), are the soils characteristic or do they meet the listing criteria as Hazardous Wastes as defined in ORC Chapter 3734 and the rules adopted thereunder?	Yes: No:	
Haz Waste	8.d.. If YES to 8.a.) and/or 8.c.), was closure of the hazardous waste unit(s), certified as completed at the property for which Ohio EPA has issued approval?	Yes: No:	
	8.e. If YES to 8.d.), provide date of closure		

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
Haz Waste	approval.		Date:
Haz Waste	8.f. If NO to 8.d.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
Haz Waste	8.g. Has an operation at the property ever generated hazardous waste in quantities that initiate Large Quantity Generator status under RCRA pursuant to OAC Chapter 3745-52?	Yes: No: ✓	
Haz Waste	8.h. If YES to 8.g.), has a generator closure been conducted and self-certified in accordance with OAC Chapter 3745-52?	Yes: No:	
Haz Waste	8.i. If YES to 8.h.), attach a copy of the self-certification of completion of generator closure.		Document name: Section: Page Number(s):
Haz Waste	8.j. If NO to 8.h.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Document name: Section: Page Number(s):
BUSTR	9. OAC 3745-300-02(B)(6) Petroleum Underground Storage Tank (UST) Systems		
BUSTR	9.a. Have there ever been any petroleum UST systems, as defined at OAC 1301:7-9-02(B)(45), located on the property?	Yes: ✓ No:	
	Note: Properties on which petroleum UST systems subject to ORC chapter 3737 and the rules adopted hereunder are located are not eligible for the VAP, unless all such obligations of site assessment, removal or remediation pursuant to ORC 3737.87 et seq. are satisfied, and Ohio EPA receives documentation of completion of those requirements.		
BUSTR	9.b. Have any known or suspected releases from any petroleum UST systems ever occurred on or emanated onto the property? Note: This must include releases that occurred from off-property UST systems.	Yes: ✓ No:	
BUSTR	9.c. Has the State Fire Marshal issued an order to the owner or operator of the UST system to close the UST system in accordance with OAC 1301:7-9-12?	Yes: No: ✓	

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
BUSTR	9.d. If YES to 9.a.) and 9.b.), indicate or attach a copy of any exemptions applicable to the UST systems.		Document name: Section: Page Number(s):
BUSTR	9.e. For each UST system to which an exemption does not apply, has the Bureau of Underground Storage Tank Systems (BUSTR) provided an NFA letter that documents satisfaction of the site assessment, removal or remediation requirements pursuant ORC chapter 3737.87 et seq. and the rule adopted thereunder for all UST systems?	Yes: ✓ No:	
BUSTR	9.f. If YES to 9.d.), provide the date of the BUSTR NFA letter and attach a copy of the BUSTR NFA letter.		Date: 1/231992 Document name: BUSTR NFA letter (1992) Section: See Attachment 4 Page Number(s): See Attachment 4 Date: 5/24/1999 Document name: BUSTR NFA letter (1999) Section: See Attachment 5 Page Number(s): See Attachment 5
BUSTR	9.g. If NO to 9.d.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Date: Document name: Section: Page Number(s):
Oil & Gas	10. OAC 3745-300-02(B)(7) Oil and Gas Wells		
Oil & Gas	10.a. Have any oil and gas wells, as those terms are defined in ORC Chapter 1509 and rules adopted thereunder, ever been located on the property?	Yes: No: ✓	
	Note: Properties on which oil and gas wells subject to ORC Chapter 1509 and the rules adopted thereunder are located are ineligible for the MOA Track, unless all obligations of ORC Chapter 1509 and the rules adopted thereunder are satisfied, and Ohio EPA receives documentation of completion of those requirements.		
Oil & Gas	10.b. If YES to 10.a.), have those wells been properly abandoned in accordance with ORC Chapter 1509 and the rules thereunder?	Yes: No:	
Oil & Gas	10.c. If YES to 10.b), provide date of approval and attach a copy of the ODNR		Date: Document name: Section:

Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
	approval documentation.		Page Number(s):
Oil & Gas	10.d. If NO to 10.b), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Date: Document name: Section: Page Number(s):
Enforcement Letter	11. OAC 3745-300-02(B)(8) Enforcement Letter		
Enforcement Letter	11.a. Is the property, or a portion thereof, subject to an enforcement letter as defined by OAC 3745-300-02 relating to a release or threatened release of hazardous substances or petroleum at or from the property?	Yes: No: ✓	
	Note: Properties subject to an enforcement letter relating to a release or threatened release of hazardous substances or petroleum are ineligible for the MOA Track, unless evidence of entry into and participation in the VAP can be demonstrated, as provided in OAC 3745-300-02(D), or unless the investigation and/or remediation obligations of the enforcement action have been completed to Ohio EPA's satisfaction and the enforcement action has been terminated.		
Enforcement Letter	11.b. If YES to 11.a.), provide the date enforcement letter was received.		Date of Enforcement Letter:
Enforcement Letter	11.c. IF YES to 11.a.), has all work under the state enforcement action been completed satisfactorily and the enforcement action been terminated?	Yes: No:	
Enforcement Letter	11.d. If YES to 11.c.), provide date of enforcement action termination and attach a copy of the letter of termination.		Termination Date: Document name: Section: Page Number(s):
Enforcement Letter	11.e. If NO to 11.c.), has a demonstration of sufficient evidence been presented for the Director's consideration pursuant to OAC 3745-300-02(D)?	Yes: No:	
Enforcement Letter	11.f. If YES to 11.e.), attach a copy of the demonstration of sufficient evidence.		Document name: Section: Page Number(s):
Completed Property Investigation and Remedy Initiated	12. MOA, p. 4. Sites which have "completed investigation and initiated a remedy" under the VAP (ORC chapter 3746 and OAC chapter 3745-300).		
Completed PI and Initiated	12.a. Have investigations and implementation of a permanent remedy	Yes:	

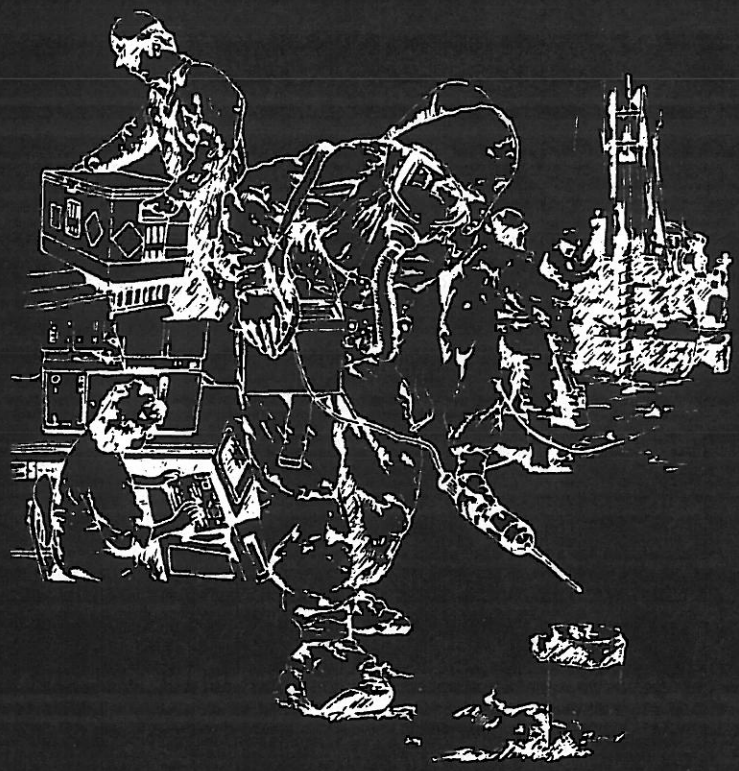
Ohio EPA RCRA & VAP MOA Track: Initial Eligibility Determination

Eligibility Type	Required Information for Initial Eligibility Determination	Yes or No (indicate which)	Provide specific responses where indicated below, and attach to this Form supporting documentation. Please reference all attachments [including document name, section and page number(s)] where the relevant information is located.
Remedy	been completed at the property, or a portion thereof?	No: ✓	
	Note: Properties for which investigations have been completed and which have a permanent remedy may be ineligible for the MOA Track. Remedies initiated under the MOA Track require Ohio EPA oversight and public comment. Please contact Ohio EPA regarding whether an implemented remedial activity may be a permanent remedy affecting the property's eligibility for the MOA Track.		
Completed PI and Initiated Remedy	12.b. If YES to 12.a.), provide the date of the completed phase I property assessment and completed phase II property assessment.		Date of completed Phase I Property Assessment: Date of completed Phase II Property Assessment:
Completed PI and Initiated Remedy	12.c. If YES to 12.a.), provide the type of remedy.		Type of remedy:
Completed PI and Initiated Remedy	12.d. If YES to 12.a.), the property may be ineligible for the MOA Track. If the property's eligibility may be justified under the MOA, the volunteer may attach an explanation of the property's favorable eligibility.		Date: Document name: Section: Page Number(s):
END OF FORM #7			

ATTACHMENT 1

SCREENING SITE INSPECTION REPORT
FOR
CANTON DROP FORGE & MFG. COMPANY
CANTON, OHIO
U.S. EPA ID: OHD004465142
SS ID: NONE
TDD: F05-9004-001
PAN: F0H0625SA

EPA
HAZARDOUS
SITE
EVALUATION
DIVISION



ecology and environment, inc.
International Specialists in the Environment

SCREENING SITE INSPECTION REPORT
FOR
CANTON DROP FORGE & MFG. COMPANY
CANTON, OHIO
U.S. EPA ID: OHD004465142
SS ID: NONE
TDD: F05-9004-001
PAN: F0H0625SA

APRIL 8, 1991

ecology and environment, inc.
111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415
International Specialists in the Environment

SIGNATURE PAGE
FOR
SCREENING SITE INSPECTION REPORT
FOR
CANTON DROP FORGE & MFG. COMPANY
CANTON, OHIO
U.S. EPA ID: OHD004465142
SS ID: NONE
TDD: F05-9004-001
PAN: F0H0625SA

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1. INTRODUCTION

Ecology and Environment, Inc., Field Investigation Team (FIT) was tasked by the United States Environmental Protection Agency (U.S. EPA) to conduct a screening site inspection (SSI) of the Canton Drop Forge & Mfg. Company (CDF) site under contract number 68-01-7347.

The site was initially discovered when Canton Drop Forge and Manufacturing submitted a Resource Conservation and Recovery Act (RCRA) Notification Form 3001 as a Generator of Hazardous Waste on August 8, 1980. The site came to the attention of the Ohio Environmental Protection Agency (OEPA) during a June 30, 1983 site inspection conducted in response to a complaint about buried drums and sludge on-site.

The site was evaluated in the form of a preliminary assessment (PA) that was submitted to U.S. EPA. The PA was prepared by Pam Wicks of the Ohio Division of Solid Hazardous Waste Management (ODSHWM) and is dated June 6, 1985.

FIT prepared an SSI work plan for the CDF site under technical directive document (TDD) F05-8706-232, issued on June 19, 1987. The SSI work plan was approved by U.S. EPA on February 14, 1990. The SSI of the CDF site was conducted on May 16, 1990, under TDD F05-9004-001, issued on April 10, 1990.

The FIT SSI included an interview with site representatives, a reconnaissance inspection of the site, and the collection of nine soil/sediment samples.

The purposes of an SSI have been stated by U.S. EPA in a directive outlining Pre-Remedial Program strategies. The directive states:

> All sites will receive a screening SI to 1) collect additional data beyond the PA to enable a more refined preliminary HRS [Hazard Ranking System] score, 2) establish priorities among sites most likely to qualify for the NPL [National Priorities List], and 3) identify the most critical data requirements for the listing SI step. A screening SI will not have rigorous data quality objectives (DQOs). Based on the refined preliminary HRS score and other technical judgement factors, the site will then either be designated as NFRAP [no further remedial action planned], or carried forward as an NPL listing candidate. A listing SI will not automatically be done on these sites, however. First, they will go through a management evaluation to determine whether they can be addressed by another authority such as RCRA [Resource Conservation and Recovery Act].... Sites that are designated NFRAP or deferred to other statutes are not candidates for a listing SI.
>
> The listing SI will address all the data requirements of the revised HRS using field screening and NPL level DQOs. It may also provide needed data in a format to support remedial investigation work plan development. Only sites that appear to score high enough for listing and that have not been deferred to another authority will receive a listing SI. (U.S. EPA 1988)

U.S. EPA Region V has also instructed FIT to identify sites during the SSI that may require removal action to remediate an immediate human health or environmental threat.

2. SITE BACKGROUND

2.1 INTRODUCTION

This section presents information obtained from SSI work plan preparation, the site representative interview, and the reconnaissance inspection of the site.

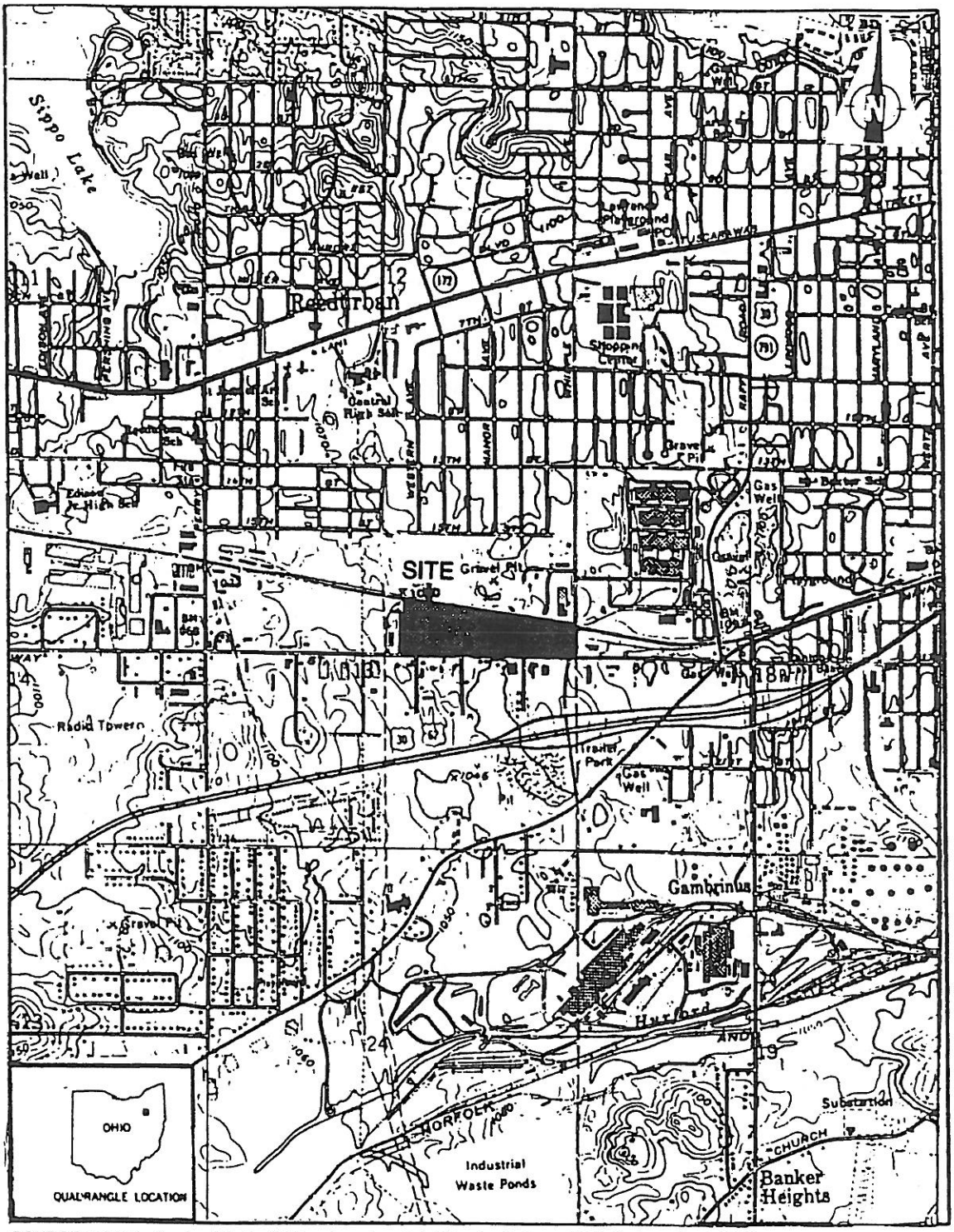
2.2 SITE DESCRIPTION

The CDF site is an active drop forge and manufacturing plant that currently manufactures parts for airplane, locomotive, and off-road transportation. The site is located at 4575 Southway SW, Stark County, Canton, Ohio (SW1/4NE1/4, sec. 13, T.10N., R.9W.). The CDF site is located in a manufacturing and urban area of Canton (see Figure 2-1 for site location). The CDF site is approximately 25 acres in size. The manufacturing plant occupies 6 of the site's 25 acres of land. An on-site landfill for manufacturing-derived wastes is located on 8 acres of the site. The remaining 11 acres of the site are used as parking and storage areas.

A 4-mile radius map of the CDF site is provided in Appendix A.

2.3 SITE HISTORY

The Canton Drop Forge and Manufacturing plant began operation in 1945. The site was owned by the United States Army Air Corps (U.S. AAC). Canton Drop Forge and Manufacturing operated the site for U.S. AAC. The manufacturing plant forged airplane propeller hubs. It is not known what the land was used for, nor who owned the site prior to U.S. AAC (Bressanelli et al. 1990).



SOURCE: USGS, Canton West, OH Quadrangle, 7.5 Minute Series, 1967 Photorevised 1978 .

SCALE
0 0.5 1 MILE

FIGURE 2-1 SITE LOCATION

In 1950, Canton Drop Forge and Manufacturing bought the site from U.S. AAC and continued on-site operations. In 1981, the Corder Group bought the CDF site and is the current site owner and operator (Bressanelli et al. 1990).

From 1950 to the present, various drop-forged parts for airplane, locomotive, and off-road transportation have been manufactured on-site. The manufacturing process, called drop forging, begins with the selection of feedstock. The feedstocks are composed of different types of steel alloys, such as carbon, nickel, and titanium. The feedstock is then cut to size and heated to 1,700 to 2,400° F. A steam-driven hammer forges the piece into the desired shape as formed by a die. Lubricating oils are used to coat the dies. The drop-forged product may then be heat-treated and cooled by quench oils or cleaned by shot blasting or grit cleaning. Prior to 1981, pickle liquor was used for scaling the steel. A small amount of grinding may be done on the product, or the product may be quality-tested. The tests performed on the product are magnaflux or zyglow, which are described as nondestructive. The product is then shipped to the customer (Bressanelli et al. 1990).

The on-site plant currently has 40 air permits for various plant operations (Bressanelli et al. 1990). Appendix B includes the various permit numbers, descriptions, issuing dates, and expiration dates.

Various waste disposal practices were used at the CDF site, including on- and off-site landfilling, collection of process water and oils in lagoons, and the reclaiming of waste oils and sludge.

The on-site landfill was licensed by the Stark County Health Department (SCHD) in June 1976 (Bozerke 1977). The license number is not known. It is not known when the landfill began operating. Canton Drop Forge and Manufacturing closed the landfill in 1979 because it had reached its capacity. The on-site landfill was approximately 8 acres in size and was located in a natural depression east of the plant buildings. The landfill was divided into two zones, Zone A and Zone B. A scrap and salvage area was located in the middle of the landfill. Zone A was closed in October 1978, and Zone B in 1979 (Bressanelli et al. 1990). According to file information, a discrepancy exists regarding

the closing date of Zone B. File information indicates that the landfill was still being used in late 1981. Canton Drop Forge and Manufacturing petitioned OEPA for an order of exemption under R.C. Section 3734.02(G) for the disposal of brickbats, concrete, and wood pallets on June 3, 1981 (OEPA 1981). OEPA granted the company's petition in a Director's Final Findings and Orders on October 15, 1981 (OEPA 1981a).

The landfilling method used on-site was the dump and cover method. Cover material for the landfill included slag, ash, lime/soda softener sludge, and demolition wastes (Cavender 1978). According to Jerome P. Bressanelli, President of Canton Drop Forge and Manufacturing, the landfill was covered with a clay soil of unknown thickness. Zone A of the landfill was used for the disposal of all wastes generated on-site. These wastes included oil sludge and waste oil in 55-gallon drums, demolition wastes (bricks and concrete), slag, ashes, lime/soda softener sludge, boiler stack scrubber sludge (gypsum), floor sweepings, trash, and rags (Cavender 1978). Zone B of the landfill was used for the disposal of demolition wastes, concrete, and other exempt wastes. These wastes were piled around Lagoon #3, one of three on-site lagoons (Cavender 1978).

In 1981, wastes generated on-site were hauled from the site by the following waste transporters: Buckeye Sanitation of Canton, Ohio (general trash); Carl Pandoli of Canton, Ohio (scrubber sludges); and R. E. Slutz Trucking of Canton, Ohio (ashes). All three transporters dumped at Breitenstine Landfill in Waynesburg, Ohio. Reclaimable oil was picked up by Northway Environmental Services of Ashtabula, Ohio, and was transported to one of three different sites. The sites were located in Harpersfield, Cleveland, and Waynesburg (Breitenstine Landfill), all in Ohio. Pickle liquor was picked up by Industrial Wastes Corporation of New Brighton, Pennsylvania, and dumped at a location in Darlington Township, Pennsylvania (OEPA 1981b). In 1990, wastes generated on-site were hauled from the site by the following waste transporters: Browning Ferris Industries of Akron, Ohio (general trash), and Advance Drain and Sewer of Wooster, Ohio (scrubber sludges) (Bressanelli et al. 1990).

A scrap and salvage area was located in the middle of the landfill area. This area was used to store scrap metal, old machinery, and other

salvageable materials. The scrap is sold whenever the market price is high (Cavender 1978; Bressanelli et al. 1990).

There are three man-made lagoons at the CDF site that are used to collect and treat plant process water. Used process water containing spent lubricating oil is dumped into Lagoon #1, where some of the oil is then skimmed off the water and collected in a 2,000-gallon tank. The lubricating oil is used to lubricate dies (Bressanelli et al. 1990). The water is then pumped via an underground pipe to Lagoon #2, where the rest of the oil is skimmed off the water. The waste oil is collected in two 2,000-gallon tanks. The water is then pumped through another underground pipe to Lagoon #3 for evaporation and infiltration. Lagoon #1 is located in the southwest corner of the site. Lagoons #2 and #3 were excavated from and are located in the landfill area (Cavender 1978). It is not known from what type of material Lagoon #1 was excavated. None of the lagoons were lined (Bressanelli 1990).

Beginning in 1976, Canton Drop Forge and Manufacturing was required by both SCHD and OEPA to file solid waste disposal operation reports for the on-site landfill and to apply for a landfill license (Bozerke 1977; Cavender 1978; Bressanelli et al. 1990). Canton Drop Forge and Manufacturing submitted a RCRA 3001 Notification as a Generator of Hazardous Waste for its F010 quench oil sludge on August 8, 1980. The F010 quench oil sludge was later reclassified to include only those oils that contain cyanide. The quench oil used on-site in the manufacturing process does not contain cyanide.

The company filed a petition on June 3, 1981, with OEPA requesting an order of exemption under R.C. Section 3734.02(G) for the disposal of brickbats, concrete, and wood pallets in the on-site landfill. OEPA granted the exemption in a Director's Final Findings and Orders on June 15, 1983 (OEPA 1981a).

OEPA conducted a site inspection of the CDF site on June 30, 1983, in response to a complaint regarding buried drums and sludges. OEPA officials observed 15 to 20 partially exposed and leaking drums buried along the edges of Lagoon #2. The drums were buried in the late 1960s. OEPA recommended that Canton Drop Forge and Manufacturing cover the

sides of Lagoon #2 with 2 feet of compacted clay-type material (OEPA 1983). No drums were observed in the pit lagoons during the FIT SSI. The fate of these drums is not known. FIT did not collect any soil samples because the exact location of the exposed drums was not known.

No additional enforcement actions regarding the CDF site had taken place as of the date of the SSI.

3. SCREENING SITE INSPECTION PROCEDURES AND FIELD OBSERVATIONS

3.1 INTRODUCTION

This section outlines procedures and observations of the SSI of the CDF site. Individual subsections address the site representative interview, reconnaissance inspection, and sampling procedures.

Rationales for specific FIT activities are also provided. The SSI was conducted in accordance with the U.S. EPA-approved work plan with one exception. Nine soil/sediment samples were collected instead of the 10 soil/sediment samples proposed in the work plan. FIT believed that 9 soil/sediment samples were adequate to characterize the CDF site.

The U.S. EPA Potential Hazardous Waste Site Inspection Report (Form 2070-13) for the CDF site is provided in Appendix C.

3.2 SITE REPRESENTATIVE INTERVIEW

John Nordine, FIT team leader, conducted an interview with Jerome P. Bressanelli, President; Larry Stalnaker, Manufacturing manager; and Ed England, Personnel Manager, all with Canton Drop Forge and Manufacturing. Fred Zollinger and Stephen Reilly, attorneys with Day, Ketterer, Raley, Wright, and Rybolt, representing Canton Drop Forge and Manufacturing, were also present at the interview. The interview was conducted on May 16, 1990, at 8:30 a.m. on-site at the plant office located at 4575 Southway St. SW, in Canton, Ohio. Henry Adamiak of FIT also attended the interview. The interview was conducted to gather information that would aid FIT in conducting SSI activities.

3.3 RECONNAISSANCE INSPECTION

Following the site representative interview, FIT conducted a reconnaissance inspection of the CDF site and surrounding area in accordance with Ecology and Environment, Inc. (E & E), health and safety guidelines. The reconnaissance inspection began on May 16, 1990, at 10:00 a.m., and included a walk-through of the site to determine appropriate health and safety requirements for conducting on-site activities and to make observations to aid in characterizing the site. FIT also determined sampling locations during the reconnaissance inspection. FIT was accompanied by Stalnaker, England, Reilly, and Don Lenk of Wadsworth Alert Labs, Inc., during the reconnaissance inspection.

Reconnaissance Inspection Observations. The CDF site is located in the southwest section of Canton, Ohio. Land use surrounding the CDF site is industrial and residential. Penn Central Railroad tracks and a gravel pit operation are located immediately north of the site (see Figure 3-1 for site features). Industries are located to the east, west, and south of the site. Residential areas are located 1/4 mile north, east, and west of the site.

The site is completely surrounded by a 10-foot-high chain link fence with three strands of barbed wire on top. There are two entrances to the CDF site, both located on Southway St. SW. There was a 24-hour guard on duty during the FIT SSI.

There are five buildings located on the CDF site. The largest building, located in the western portion of the site, is used for manufacturing purposes. The remaining buildings are located in the west-central portion of the site and immediately north and south of the manufacturing building. These buildings include the power house, chip house, die shop, and office building. The manufacturing building is divided into three departments: a drop forge area in the middle, an upsetter area in the building's west wing, and a grinding and shipping area in the east wing. Two die stacks were located in the northwest corner of the site, with stained soil observed near one of the stacks. A water tank is located north of the chip house. A lime tank was located near the power house. Four buried, 25,000-gallon tanks used for the storage of fuel oil and other bulk liquids were located west of the

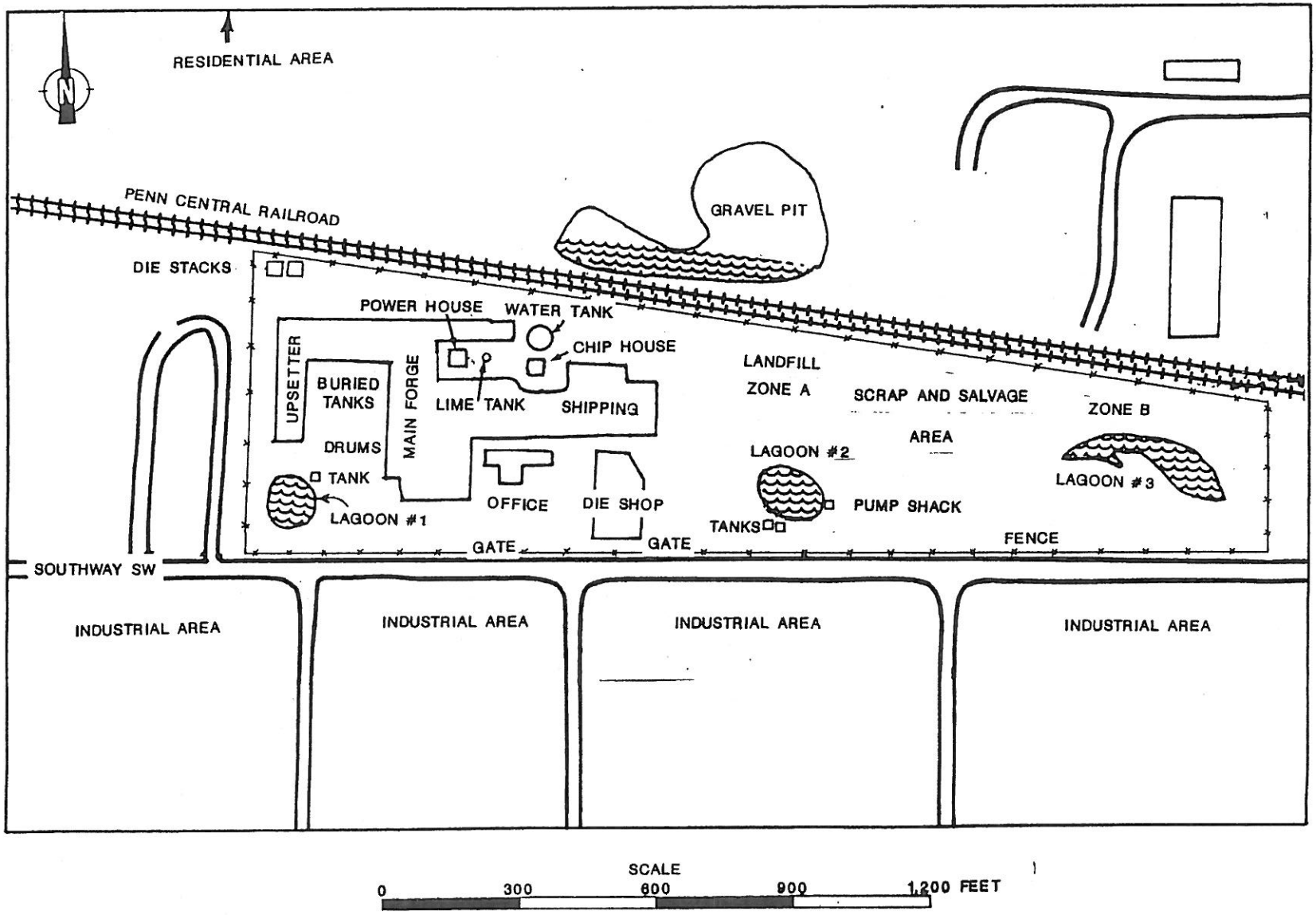


FIGURE 3-1 SITE FEATURES

drop forge area of the manufacturing building. Approximately 20, 55-gallon drums of lubricating oil were stored on a concrete pad just south of the buried tanks. The drums appeared to be in good condition.

Lagoon #1 is located in the southwest corner of the site. Lagoon #1 is approximately 100 feet in diameter. FIT observed an oily sheen on the water in Lagoon #1. The ground around Lagoon #1 appeared to be covered with black ash or cinders. This lagoon is used to skim waste oil from process water. Skimmed waste oil is collected in a 2,000-gallon tank immediately northwest of the lagoon. Water from Lagoon #1 is then pumped into Lagoon #2, which is located approximately 300 feet east of the die shop. Lagoon #2 is oval shaped and is approximately 100 feet by 125 feet in diameter. Lagoon #2 is the second stage of the water treatment process. Water in Lagoon #2 had oil floating on it. The banks of Lagoon #2 were coated with oil sludge. An oil skimmer is used to collect the rest of the oil from the water surface. Waste oil is then pumped into two 20,000-gallon tanks. Water from Lagoon #2 is then pumped into a third lagoon (Lagoon #3). A pump shack was located on the east edge of Lagoon #2. Piles of oily, scale-type material were located northwest of Lagoon #2. Lagoon #3 is located in the eastern half of the site and is crescent shaped. Lagoon #3 is used for the filtration of processed wastewater. Water in some areas of the lagoon had an oily sheen.

The on-site landfill is located in the eastern half of the site and is approximately 18 acres in size. The landfill is divided into a Zone A and a Zone B, with a scrap and salvage area between the two zones. The landfill had a fresh clay soil cap. The parts of the landfill that did not have a fresh cover appeared to be covered with black cinders and ash.

Piles of iron and steel are stored in the scrap and salvage area until the price of the materials is high enough to justify being sold. Dies and other used machinery were also observed in this area.

FIT photographs from the SSI of the CDF site are provided in Appendix D.

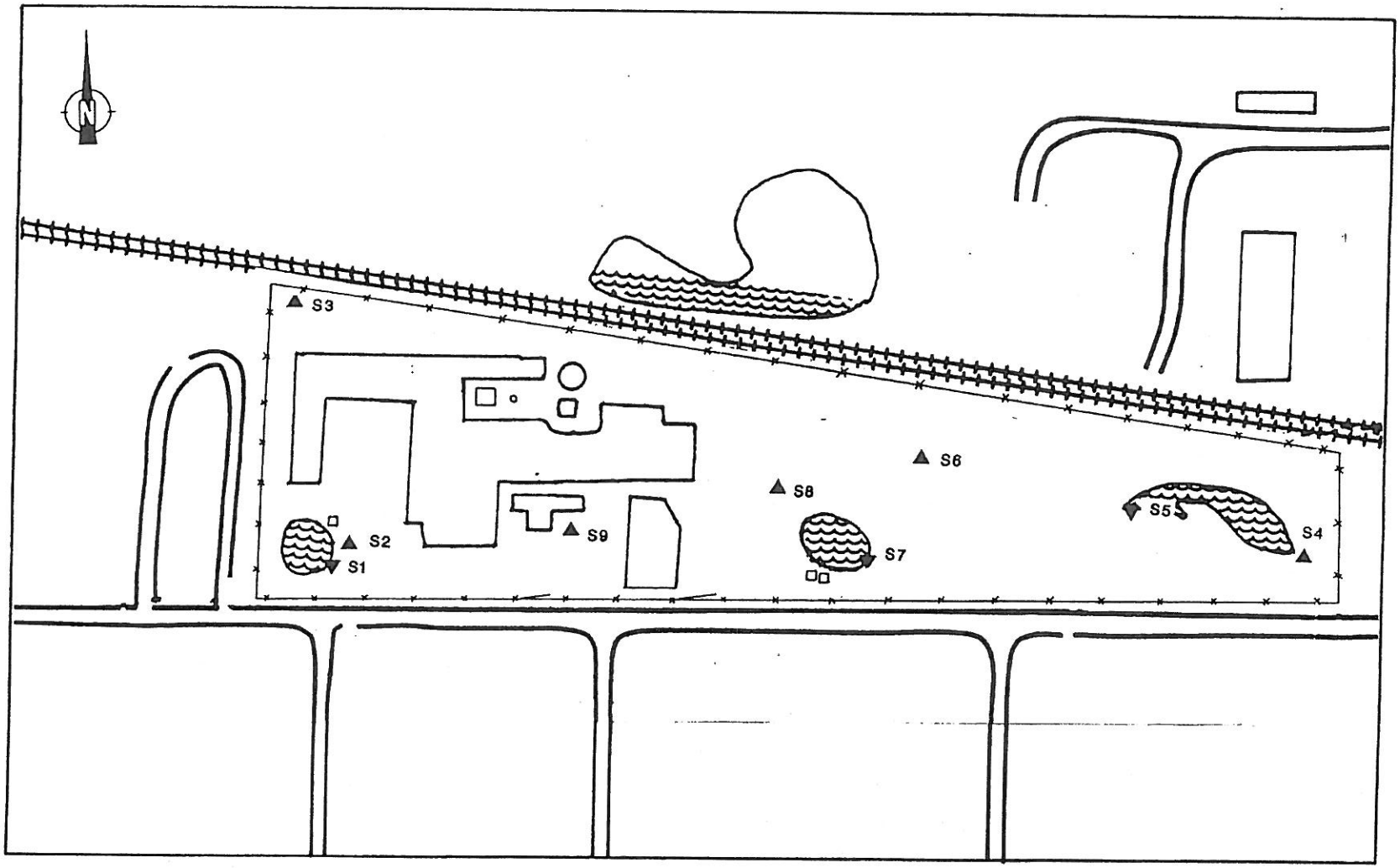
3.4 SAMPLING PROCEDURES

Samples were collected by FIT at locations selected during the reconnaissance inspection to determine whether U.S. EPA Target Compound List (TCL) compounds or Target Analyte List (TAL) analytes were present at the site. The TCL and TAL are included with corresponding quantitation/detection limits in Appendix E. Portions of the samples were offered to and accepted by the site representatives.

Soil/Sediment Sampling Procedures. Sediment sample S1 was collected from the east bank of Lagoon #1 (see Figure 3-2 for soil/sediment sampling locations). Soil sample S2 was collected from an oily pile of scales or cinders near Lagoon #1. Soil sample S3 was collected from the stained soil near one of the die stacks in the northwest corner of the site. Soil sample S4 was collected from an oily area in a low area east of Lagoon #3. Sediment sample S5 was collected from the west bank of Lagoon #3. Soil sample S6 was collected in an area of stained soil north of Lagoon #2 where the clay soil cap had not been applied on the landfill. Soil sample S7 was collected from the bank of Lagoon #2 near the pump shack. Soil sample S8 was collected from an area of stained soil near the scrap and salvage area. Soil sample S9 was collected as a potential background sample from a grassy area located between the office and the manufacturing buildings. All sediment samples were collected from oil-stained areas on the banks of the lagoons. All soil/sediment samples were surface samples and were collected with a trowel.

Standard E & E decontamination procedures were adhered to during the collection of all soil/sediment samples. The procedures included the scrubbing of all equipment (e.g., gloves, trowels, and bowls) with a solution of detergent (Alconox) and distilled water, and triple-rinsing the equipment with distilled water before the collection of each sample (E & E 1987). All soil/sediment samples were packaged and shipped in accordance with U.S. EPA-required procedures.

As directed by U.S. EPA, all soil/sediment samples were analyzed using the U.S. EPA Contract Laboratory Program (CLP).



SCALE

0 300 600 900 1,200 FEET

LEGEND

▲ SOIL ▼SEDIMENT

FIGURE 3-2 SOIL/SEDIMENT SAMPLING LOCATIONS

4. ANALYTICAL RESULTS

This section presents results of the chemical analysis of FIT-collected soil/sediment samples for TCL compounds and TAL analytes. All samples were analyzed for volatile organics, semivolatile organics, pesticides/polychlorinated biphenyls (PCBs), metals, and cyanides. Complete chemical analysis results of FIT-collected soil/sediment samples are provided in Table 4-1. In addition, significant tentatively identified compounds (TICs) detected in the analysis of FIT-collected samples are also provided in Table 4-1.

Quantitation/detection limits used in the analysis of soil/sediment samples are provided in Appendix E.

The analytical data for the chemical analysis of soil/sediment samples collected for this SSI have been reviewed by U.S. EPA for compliance with terms of CLP, and the review has been approved by U.S. EPA. The analytical data have also been reviewed by FIT for validity and usability. Any additions, deletions, or changes to the data have been incorporated in the chemical analysis results tables presented in this section.

5. DISCUSSION OF MIGRATION PATHWAYS

5.1 INTRODUCTION

This section presents discussions of data and information pertaining to potential migration pathways and targets of TCL compounds and TAL analytes that are possibly attributable to the CDF site.

The five migration pathways of concern discussed are groundwater, surface water, air, fire and explosion, and direct contact.

5.2 GROUNDWATER

Groundwater sampling was not conducted at the CDF site because no monitoring wells were installed at the site. However, a potential exists for TCL compounds and TAL analytes to migrate from the site to groundwater in the vicinity of the site, based on the following information.

- TCL compounds and TAL analytes were detected in on-site soil/sediment samples, including xylenes (total) (140J µg/kg in S2), phenanthrene (4,000 µg/kg in S7), chromium (405 mg/kg in S8), and nickel (1,550 mg/kg in S8).

- Several TICs were detected in the soil/sediment samples.

- The three on-site lagoons are unlined, and Lagoon #2 and Lagoon #3 were excavated from landfill material (Bressanelli et al. 1990).

- The landfill is not lined (Bressanelli et al. 1990).

- Fifteen to 20 drums of used lubricants were buried in the landfill and some of the drums were observed to be leaking (OEPA 1983).

The potential for migration of TCL compounds and TAL analytes to area groundwater is also based on the following geological information.

The geology of the site area consists of unconsolidated glacially derived deposits that overlie sedimentary bedrock. The glacially derived deposits in the site area have been identified as till deposited during the Pleistocene epoch, Wisconsinan age. The till is an unsorted, unstratified mixture of sand, silt, and clay containing pebbles, cobbles, and boulders (DeLong and White 1963).

Well logs of the area indicate that these deposits occur in some areas as discontinuous lenses and layers. A well log for an on-site production well indicates the thickness of the till to be 71 feet before reaching bedrock (see Appendix F for well logs of the area of the site). Access to this well was not available at the time of the FIT SSI. Area well logs indicate the depth to groundwater to be approximately 24 feet in the sand and gravel layers. Where saturated, these sand and gravel deposits are used as a source of drinking water.

The bedrock in the area of the site consists of sedimentary rock deposited during the Pennsylvanian period. These rock units include members of the Upper Pottsville groups, which have shales, coals, clays, limestones, sandstones, and siltstones (DeLong and White 1963). Well logs for the site area indicate that bedrock wells draw from water-producing sandstones.

The aquifer of concern (AOC) includes both the glacial deposits and the upper parts of the bedrock. Area well logs indicate that private drinking water wells use both the glacial sand and gravel deposits and the bedrock sandstones. Because there is no evidence of a continuous confining layer within a 3-mile radius of the site, the two systems are considered to be hydraulically connected. The depth to the AOC is the same as the depth to groundwater, that is, approximately 24 feet. The

direction of groundwater flow is assumed to be to the northwest, toward Sippo Lake. Sippo Lake is approximately 2 miles northwest of the site. Targets of groundwater contamination include those persons who use private wells within a 3-mile radius of the CDF site. The Canton well fields are located to the southwest of the CDF site and outside of a 3-mile radius of the site. The total population using groundwater is approximately 4,227 persons. This population was calculated by counting houses within a 3-mile radius of the site on United States Geological Survey (USGS) topographic maps of the area of the site (USGS 1961, 1967), and then multiplying this total by the Stark County persons-per-household value of 2.77 (U.S. Bureau of the Census 1982).

5.3 SURFACE WATER

Sippo Lake and Lake Meyers are located within 2 miles of the site. Some water-filled gravel pits are also located within 2 miles of the site. Both lakes Sippo and Meyers are used for recreational purposes. No potential exists, however, for TCL compounds and TAL analytes from the CDF site to migrate to surface water in the area. This lack of potential is based on the fact that the site is relatively flat. Surface water runoff from the site would be diverted before reaching the lakes by intervening streets and railroads.

5.4 AIR

A release of TCL compounds or TAL analytes to the air was not dcoumented during the SSI of the CDF site. During the reconnaissance inspection, FIT site-entry instruments (OVA 128 and colorimetric monitoring tubes for hydrogen cyanide) did not detect levels above background concentrations at the site. In accordance with the U.S. EPA-approved work plan, further air monitoring was not conducted by FIT.

A potential does not exist for TCL compounds and TAL analytes to migrate from the site via windblown particulates because the on-site landfills have been capped.

5.5 FIRE AND EXPLOSION

According to federal, state, and local file information revieved by FIT, and an interview with Bressanelli, no documentation exists of an

incident of fire or explosion at the site (Bressanelli et al. 1990). According to FIT observations and site-entry equipment readings, no potential for fire or explosion existed at the site at the time of the SSI.

5.6 DIRECT CONTACT

According to federal, state, and local file information reviewed by FIT, observations made during the SSI, and the interview with the site representatives, no incidents of direct contact with TCL compounds or TAL analytes at the CDF site have been documented. The site is completely fenced and there is a 24-hour guard on duty at all times (Bressanelli et al. 1990). There is a potential, however, for the 378 employees that work on-site to come into direct contact with TCL compounds and TAL analytes detected in on-site soil/sediment samples.

6. REFERENCES

Bozerke, Stephen, June 6, 1977, report form, regarding on-site disposal of solid wastes, for Ohio Health Department.

Bressanelli, Jerome P., Larry Stalnaker, Ed England, Fred Zollinger, and Stephen Reilly, May 16, 1990, President, Manufacturing Manager, and Personnel Manager, all from Canton Drop Forge and Manufacturing; and attorneys, Day, Ketterer, Raley, Wright, and Rybolt, Esq., site representative interview, conducted by John Nordine of E & E.

Cavender, Carl, June 21, 1978, President, Canton Drop Forge and Manufacturing, operational report, regarding solid waste disposal at the CDF site, Report No. COF-58515.

DeLong, R., and George White, 1963, Geology of Stark County, Bulletin 61, Ohio Department of Natural Resources, Division of Geological Survey, Columbus, Ohio.

E & E, 1987, Quality Assurance Project Plan Region V FIT Conducted Site Inspections, Chicago, Illinois.

OEPA, October 16, 1981, letter, to Carl Cavender, President, Canton Drop Forge and Manufacturing, from Wayne Nichols, OEPA.

_____, October 15, 1981a, Director's Final Findings and Orders, written by Wayne Nichols, OEPA.

_____, March 11, 1981b, letter, to R. Rebillot, Chief Engineer, Canton Drop Forge and Manufacturing, regarding 1981 Industrial Waste Survey, by Mark Schmidt, Office of Land Pollution Control.

_____, July 28, 1983, letter, from Rodney Beals, Division of Hazardous Materials Management, to Ed England, Canton Drop Forge and Manufacturing.

U.S. Bureau of the Census, 1982, 1980 Census of Population, Characteristics of the Population, General Population Characteristics, Ohio, Washington, D.C.

U.S. EPA, February 12, 1988, Office of Solid Waste and Emergency Response, Pre-Remedial Strategy for Implementing SARA, Directive number 9345.2-01, Washington, D.C.

USGS, 1961, photorevised 1978, Bolivar, Ohio Quadrangle, 7.5 Minute Series: 1:24,000.

_____, 1967, photorevised 1978, Canton West, Ohio Quadrangle, 7.5 Minute Series: 1:24,000.

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A

APPENDIX A

SITE 4-MILE RADIUS MAP

APPENDIX B

E.P.A. Premise No.	MIK	Description	Company I.D.	Issued	Expires
1576000073	B001	Boiler #1 Coal	B001	9-23-88	9-22-91
"	B002	Boiler #2 Gas/Oil	B002	11-08-88	11-07-91
"	B003	Boiler #3 Gas/Oil	B003	11-08-88	11-07-91
"	P028	Tumbleblast	BH-0B02	5-20-88	5-20-91
"	P032	Deepbore Unit	BH-0B06	5-20-88	5-20-91
"	P029	Tumbleblast	BH-0B07	5-20-88	5-20-91
"	P036	Super II Tumblast	BH-0B08	12-12-89	12-11-92
"	P045	Super II Tumblast	BH-0B09	11-18-88	11-18-91
"	F001	Plt Roadways + Parking Area	—	2-26-88	2-26-91
"	P037	Box Furnace	BF-FB09	3-30-84	On Registration
"	P038	Box Furnace	BF-FB10	3-30-84	On Registration
"	P039	Box Furnace	BF-FB14	3-30-84	On Registration
"	P001	17' Rotary Furnace	BF-FR01	9-24-76	On Registration
"	P002	17' Rotary Furnace	BF-FR02	9-24-76	On Registration
"	P003	17' Rotary Furnace	BF-FR03	9-24-76	On Registration
"	P004	17' Rotary Furnace	BF-FR04	9-24-76	On Registration
"	P005	17' Rotary Furnace	BF-FR05	9-24-76	On Registration
"	P006	17' Rotary Furnace	BF-FR06	9-24-76	On Registration
"	P007	14' Rotary Furnace	BF-FR07	9-24-76	On Registration
"	P009	17' Rotary Furnace	BF-FR10	9-24-76	On Registration
"	P010	14' Rotary Furnace	BF-FR09	9-24-76	On Registration
"	P015	Box Furnace	BF-FB07	9-24-76	On Registration
"	P016	Box Furnace	BF-FB11	9-24-76	On Registration
"	P017	Box Furnace	BF-FB08	9-24-76	On Registration
"	P019	Box Furnace	BF-FB12	9-24-76	On Registration
"	P020	Box Furnace	BF-FB05	9-24-76	On Registration
"	P021	Box Furnace	BF-FB21	9-24-76	On Registration
"	P022	Annealing Furnace	BH-0F01	9-24-76	On Registration
"	P023	Annealing Furnace	BH-0F02	9-24-76	On Registration
"	P024	Annealing Furnace	BH-0F05	9-24-76	On Registration
"	P025	Car Type Furnace	BH-0F07	9-24-76	On Registration
"	P026	Quench + Draw Furnace	BH-0F06	9-24-76	On Registration
"	P027	Quench + Draw Furnace	BH-0F08	9-24-76	On Registration

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AIR

EPA Premise No.		Description	Company ID	Issued	Expires
1576000073	P030	Tumblast	BH-0B03	9.24.76	On Registration
"	P040	Gas Heat Treat Furnace	BH-GF09	2.17.84	On Registration
"	P041	17' Rotary Furnace	BF-FP11	10.04.85	On Registration
"	P043	Gas Hardening Furnace	BH-GF10	4.25.86	On Registration
"	P033	Machine Grinders	Grinding Area #1	7.02.87	Reclassified On Registration
"	P034	Hand Grinders	Grinding Area #2	7.02.87	Reclassified On Registration
"	P035	Hand Grinders	Grinding Area #3	7.02.87	Reclassified On Registration

APPENDIX C

U.S. EPA FORM 2070-13

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	P004651422

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Canton Drop Forge	4575 Southway Street SW

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Canton	OH	44706	Stark	151	4

09 COORDINATES LATITUDE	LONGITUDE
40 48 45.N	081 23 45.W

10 TYPE OF OWNERSHIP (Check one)
■ A. PRIVATE ☐ B. FEDERAL ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER ☐ G. UNKNOWN

III. INSPECTION INFORMATION

01 DATE OF INSPECTION	02 SITE STATUS	03 YEARS OF OPERATION
05 / 16 / 90 (MONTH DAY YEAR)	■ ACTIVE ☐ INACTIVE	1945 (BEGINNING YEAR) / present (ENDING YEAR) ☐ UNKNOWN

04 AGENCY PERFORMING INSPECTION (Check all that apply)
☐ A. EPA ■ B. EPA CONTRACTOR Ecology + Environment, Inc. (Name of firm) ☐ C. MUNICIPAL ☐ D. MUNICIPAL CONTRACTOR ____ (Name of firm)
☐ E. STATE ☐ F. STATE CONTRACTOR ____ (Name of firm) ☐ G. OTHER ____ (Specify)

05 CHIEF INSPECTOR	06 TITLE	07 ORGANIZATION	08 TELEPHONE NO.
John Nordine	Ecologist	E+E, Inc.	(312) 663-9415
09 OTHER INSPECTORS	10 TITLE	11 ORGANIZATION	12 TELEPHONE NO.
Henry Adamiak	Civil Engineer	"	( ) "
Joe Corns	Civil Engineer	"	( ) "
Sherrie Stevens	Health + Safety Specialist	"	( ) "
			( )
			( )

13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15 ADDRESS	16 TELEPHONE NO
Jerome P. Bressanelli	President	4575 Southway St SW	(216) 477-4571
Larry L. Stalnaker	Manager	" " "	(") "
Ed England	Manager	" " "	(") "
Stephen J. Reilly	attorney	50 West Broad St	(614) 228-3611
Fred H. Zollinger, Jr.	attorney	121 Cleveland Ave. S.	(216) 455-5073
			( )

17 ACCESS GAINED BY	18 TIME OF INSPECTION	19 WEATHER CONDITIONS
■ PERMISSION ☐ WARRANT	530	cloudy, light rain, 50°F

IV. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NO.
Rod Beals	OEPA NE District	(216) 425-9171

04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NO.	08 DATE
John Nordine	U.S. EPA	E+E, Inc	312-663-9415	10 / 8 / 90 (MONTH DAY YEAR)

EPA FORM 2070-13 (7-81)

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	D0046514 2

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)
- [x] A. SOLID
- [ ] B. POWDER, FINES
- [x] C. SLUDGE
- [ ] D. OTHER (Specify)
- [ ] E. SLURRY
- [x] F. LIQUID
- [ ] G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent.)
- TONS: unknown
- CUBIC YARDS:
- NO. OF DRUMS:

03 WASTE CHARACTERISTICS (Check all that apply)
- [x] A. TOXIC
- [ ] B. CORROSIVE
- [ ] C. RADIOACTIVE
- [x] D. PERSISTENT
- [x] E. SOLUBLE
- [ ] F. INFECTIOUS
- [ ] G. FLAMMABLE
- [ ] H. IGNITABLE
- [ ] I. HIGHLY VOLATILE
- [ ] J. EXPLOSIVE
- [ ] K. REACTIVE
- [ ] L. INCOMPATIBLE
- [ ] M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	unknown		
OLW	OILY WASTE	unknown		
SOL	SOLVENTS	unknown		See Section 4 of Narrative
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	unknown		
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	unknown		

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	See Section 4 of Narrative				

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	steel	NA	FDS		
FDS	carbon alloy	NA	FDS		
FDS	nickel alloy	NA	FDS		
FDS	Titanium	NA	FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E & E FIT files Federal and State files
Site Inspection 5/16/90

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	D004654742

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 4,227 04 NARRATIVE DESCRIPTION

See narrative section 5.2 for information.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

See narrative section 5.3 for information.

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

See narrative section 5.4 for information

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

See narrative section 5.5 for information.

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 378 04 NARRATIVE DESCRIPTION

See narrative section 5.6 for information

01 ☐ F. CONTAMINATION OF SOIL 02 ☒ OBSERVED (DATE 5/16/90) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: 25 (Acres) 04 NARRATIVE DESCRIPTION

See narrative sections 4 and 5 for information

01 ☒ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 4,227 04 NARRATIVE DESCRIPTION

See narrative section 5.2 for information.

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: 378 04 NARRATIVE DESCRIPTION

There is a potential that workers may come in contact with the TCL compounds and TAL analytes found in on-site soils

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 4227 04 NARRATIVE DESCRIPTION

See narrative section 5 for information

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	D00465142

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
The landfilled area had a new clay cover applied no flora had been established at the time of the inspection 5/16/90

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)
The site is fenced, No damage to fauna has been reported and none was observed by FIT.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
The site is in the city and is fenced.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES (Spills/Runoff/Standing liquids, Leaking drums) — 02 ☐ OBSERVED (DATE: 6/25/83, 6/15/90) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 4,277
04 NARRATIVE DESCRIPTION OEPA observed leaking oil drums during a site inspection. Onsite soil samples collected TAL analytes and TCL compounds.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
None observed by FIT.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
N/A

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☒ ALLEGED
04 NARRATIVE DESCRIPTION
None observed by FIT. June 30, 1983 a complaint was filed with the OEP about buried drums and sludge disposal on-site.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS
None

III. TOTAL POPULATION POTENTIALLY AFFECTED: 4277

IV. COMMENTS
None

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)
FIT files, Federal and State files
Site inspection 5/16/90

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	000465142

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED (Check all that apply)	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
☐ A. NPDES				
☐ B. UIC				
☒ C. AIR	see appendix B			
☐ D. RCRA				
☐ E. RCRA INTERIM STATUS				
☐ F. SPCC PLAN				
☒ G. STATE (Specify)	unknown			permit for landfill
☐ H. LOCAL (Specify)				
☐ I. OTHER (Specify)				
☐ J. NONE				

III. SITE DESCRIPTION

01 STORAGE/DISPOSAL (Check all that apply)	02 AMOUNT	03 UNIT OF MEASURE
☒ A. SURFACE IMPOUNDMENT	unknown	
☐ B. PILES		
☒ C. DRUMS, ABOVE GROUND	≈ 20	55 gallon
☒ D. TANK, ABOVE GROUND	8,000	gallons
☒ E. TANK, BELOW GROUND	100,000	gallons
☒ F. LANDFILL	unknown	
☐ G. LANDFARM		
☐ H. OPEN DUMP		
☐ I. OTHER (Specify)		

04 TREATMENT (Check all that apply)

- ☐ A. INCENERATION
- ☐ B. UNDERGROUND INJECTION
- ☐ C. CHEMICAL/PHYSICAL
- ☐ D. BIOLOGICAL
- ☐ E. WASTE OIL PROCESSING
- ☐ F. SOLVENT RECOVERY
- ☒ G. OTHER RECYCLING/RECOVERY
- ☐ H. OTHER (Specify)

05 OTHER

☒ A. BUILDINGS ON SITE

5 buildings

06 AREA OF SITE

25 (Acres)

07 COMMENTS

See narrative sections 2 and 3 for information

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

☐ A. ADEQUATE, SECURE ☐ B. MODERATE ☒ C. INADEQUATE, POOR ☐ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.

See narrative section 2 and 3 for information

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☐ YES ☒ NO

02 COMMENTS

See narrative sections 2, 3, and 5 for information

VI. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

E&E FIT, Federal and State files, site inspection 5/16/90

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE: OH | 02 SITE NUMBER: D004651 42

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY (Check as applicable)

	SURFACE	WELL
COMMUNITY	A. ☐	B. ☒
NON-COMMUNITY	C. ☐	D. ☒

02 STATUS

ENDANGERED	AFFECTED	MONITORED
A. ☐	B. ☐	C. ☒
D. ☐	E. ☐	F. ☐ unknown

03 DISTANCE TO SITE
A. _____ (mi)
B. on site (mi)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY (Check one)
☒ A. ONLY SOURCE FOR DRINKING ☐ B. DRINKING (Other sources available) COMMERCIAL, INDUSTRIAL, IRRIGATION (No other water sources available) ☐ C. COMMERCIAL, INDUSTRIAL, IRRIGATION (Limited other sources available) ☐ D. NOT USED, UNUSEABLE

02 POPULATION SERVED BY GROUND WATER 4,277
03 DISTANCE TO NEAREST DRINKING WATER WELL on site (mi)

04 DEPTH TO GROUNDWATER	05 DIRECTION OF GROUNDWATER FLOW	06 DEPTH TO AQUIFER OF CONCERN	07 POTENTIAL YIELD OF AQUIFER	08 SOLE SOURCE AQUIFER
24 (ft)	northwest	24 (ft)	3,456,000 (gpd)	☐ YES ☒ NO

09 DESCRIPTION OF WELLS (Including usage, depth, and location relative to population and buildings)
See narrative section 5.2

10 RECHARGE AREA		11 DISCHARGE AREA	
☒ YES ☐ NO	COMMENTS: The 3 lagoons on site are used for infiltration	☒ YES ☐ NO	COMMENTS: discharge to near by gravel pits.

IV. SURFACE WATER

01 SURFACE WATER USE (Check one)
☒ A. RESERVOIR, RECREATION DRINKING WATER SOURCE ☐ B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES ☐ C. COMMERCIAL, INDUSTRIAL ☒ D. NOT CURRENTLY USED

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME:	AFFECTED	DISTANCE TO SITE
NA Lake Lipper	☐	1 1/4 (mi)
Lake Meyers	☐	2 (mi)
	☐	(mi)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN

ONE (1) MILE OF SITE	TWO (2) MILES OF SITE	THREE (3) MILES OF SITE
A. 1,863 NO OF PERSONS	B. ≈24,000 NO OF PERSONS	C. ≈36,000 NO OF PERSONS

02 DISTANCE TO NEAREST POPULATION
1/4 (mi)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE
≈9,000

04 DISTANCE TO NEAREST OFF-SITE BUILDING
200 feet (mi)

05 POPULATION WITHIN VICINITY OF SITE (Provide narrative description of nature of population within vicinity of site, e.g., rural, village, densely populated urban area)
The population within the vicinity of the site is residential with some industrial areas.

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION

01 STATE: OH | 02 SITE NUMBER: D004765142

VI. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

☐ A. $10^{-6} - 10^{-8}$ cm/sec ☐ B. $10^{-4} - 10^{-6}$ cm/sec ☒ C. $10^{-4} - 10^{-3}$ cm/sec ☐ D. GREATER THAN 10^{-3} cm/sec

02 PERMEABILITY OF BEDROCK (Check one)

☐ A. IMPERMEABLE (Less than 10^{-6} cm/sec) ☐ B. RELATIVELY IMPERMEABLE ($10^{-4} - 10^{-6}$ cm/sec) ☒ C. RELATIVELY PERMEABLE ($10^{-2} - 10^{-4}$ cm/sec) ☐ D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)

03 DEPTH TO BEDROCK	04 DEPTH OF CONTAMINATED SOIL ZONE	05 SOIL pH	
71 (ft)	unknown (2)	unknown	

06 NET PRECIPITATION	07 ONE YEAR 24 HOUR RAINFALL	08 SLOPE: SITE SLOPE	DIRECTION OF SITE SLOPE	TERRAIN AVERAGE SLOPE
4 (in)	2.3 (in)	0 %	NA	0 %

09 FLOOD POTENTIAL

SITE IS IN NA YEAR FLOODPLAIN

10 NA ☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS (5 acre minimum)

ESTUARINE: A. _____ (mi) OTHER: B. N/A (mi)

12 DISTANCE TO CRITICAL HABITAT (of endangered species)

NA (mi)

ENDANGERED SPECIES: None

13 LAND USE IN VICINITY

DISTANCE TO:

COMMERCIAL/INDUSTRIAL	RESIDENTIAL AREAS, NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES	AGRICULTURAL LANDS: PRIME AG LAND	AG LAND
A. 200¼ feet (mi)	B. ¼ (mi)	C. NA (mi)	D. NA (mi)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

See 4-mile radius map in Appendix A

VII. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E+E FIT files, Federal and State files

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 6 - SAMPLE AND FIELD INFORMATION

I. IDENTIFICATION
01 STATE: OH | 02 SITE NUMBER: OOD044651442

II. SAMPLES TAKEN

SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE
GROUNDWATER			available
SURFACE WATER			
WASTE			
AIR			
RUNOFF			
SPILL			
SOIL		see section 3.4	
VEGETATION			
OTHER			

III. FIELD MEASUREMENTS TAKEN

01 TYPE	02 COMMENTS
OVA 128	No Readings above background
Radiation Mini Alert	No readings above background
Explosion Meter	0% LEL
Oxygen Meter	21% O2
Drager Pumps (HCN)	No readings above background

IV. PHOTOGRAPHS AND MAPS

01 TYPE ☒ GROUND ☐ AERIAL

02 IN CUSTODY OF Ecology & Environment, Inc. Chicago, IL. (Name of organization or individual)

03 MAPS ☒ YES ☐ NO

04 LOCATION OF MAPS Ecology & Environment, Inc. Chicago, IL.

V. OTHER FIELD DATA COLLECTED (Provide narrative description)

N/A

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E & E, Inc. FIT site inspection 5/16/90

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION
01 STATE: OH | 02 SITE NUMBER: D004465142

II. CURRENT OWNER(S)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
Cordier Group		unknown		Hudson	OH	
N/A						
NA						
NA						

PARENT COMPANY (if applicable)

08 NAME	09 D+B NUMBER	10 STREET ADDRESS (P.O. Box, RFD #, etc.)	11 SIC CODE	12 CITY	13 STATE	14 ZIP CODE
NA						
NA						
NA						

III. PREVIOUS OWNER(S) (List most recent first)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
Canton Drop Forge		4575 Southway St. SW		Canton	OH	44706
U.S. Army Air Corp		unknown				
NA						
NA						

IV. REALTY OWNER(S) (If applicable, list most recent first)

01 NAME	02 D+B NUMBER	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	05 CITY	06 STATE	07 ZIP CODE
NA						
NA						
NA						
NA						

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E+E FIT files Federal and State files
site inspection 5/16/90

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 8 - OPERATOR INFORMATION

I. IDENTIFICATION
01 STATE: OH | 02 SITE NUMBER: D004465142

II. CURRENT OPERATOR (Provide if different from owner)

01 NAME	02 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE

05 CITY	06 STATE	07 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER

OPERATOR'S PARENT COMPANY (If applicable)

10 NAME	11 D+B NUMBER
NA	

12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

14 CITY	15 STATE	16 ZIP CODE

III. PREVIOUS OPERATOR(S) (List most recent first; provide only if different from owner)

PREVIOUS OPERATORS' PARENT COMPANIES (If applicable)

01 NAME	02 D+B NUMBER	10 NAME	11 D+B NUMBER
Canton Drop Forge		NA	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE
4575 Southway St. SW,			

05 CITY	06 STATE	07 ZIP CODE	14 CITY	15 STATE	16 ZIP CODE
Canton	OH	44706			

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD
36	

01 NAME	02 D+B NUMBER	10 NAME	11 D+B NUMBER
NA		NA	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	14 CITY	15 STATE	16 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

01 NAME	02 D+B NUMBER	10 NAME	11 D+B NUMBER
NA		NA	

03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	12 STREET ADDRESS (P.O. Box, RFD #, etc.)	13 SIC CODE

05 CITY	06 STATE	07 ZIP CODE	14 CITY	15 STATE	16 ZIP CODE

08 YEARS OF OPERATION	09 NAME OF OWNER DURING THIS PERIOD

IV. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E+E, FIT, Federal, and State files
site inspection 5/16/90

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	D004465142

II. ON-SITE GENERATOR

01 NAME	02 D+B NUMBER
Canton Drop Forge	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	**04 SIC CODE**
4575 Southway St SW	
05 CITY	**06 STATE** / **07 ZIP CODE**
Canton	OH / 44706

III. OFF-SITE GENERATOR(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
N.A.		N.A.	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	**04 SIC CODE**	**03 STREET ADDRESS (P.O. Box, RFD #, etc.)**	**04 SIC CODE**
05 CITY	**06 STATE** / **07 ZIP CODE**	**05 CITY**	**06 STATE** / **07 ZIP CODE**
01 NAME	**02 D+B NUMBER**	**01 NAME**	**02 D+B NUMBER**
N.A.		NA	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	**04 SIC CODE**	**03 STREET ADDRESS (P.O. Box, RFD #, etc.)**	**04 SIC CODE**
05 CITY	**06 STATE** / **07 ZIP CODE**	**05 CITY**	**06 STATE** / **07 ZIP CODE**

IV. TRANSPORTER(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
Browning Ferris Industries		Advance Drain & Sewer	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	**04 SIC CODE**	**03 STREET ADDRESS (P.O. Box, RFD #, etc.)**	**04 SIC CODE**
1447 Manton Road		3113 Lincoln Way West	
05 CITY	**06 STATE** / **07 ZIP CODE**	**05 CITY**	**06 STATE** / **07 ZIP CODE**
Akron	OH / 44319	Wooster	OH
01 NAME	**02 D+B NUMBER**	**01 NAME**	**02 D+B NUMBER**
Research Oil Reclamation			
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	**04 SIC CODE**	**03 STREET ADDRESS (P.O. Box, RFD #, etc.)**	**04 SIC CODE**
2655 Transport Road			
05 CITY	**06 STATE** / **07 ZIP CODE**	**05 CITY**	**06 STATE** / **07 ZIP CODE**
Cleveland	OH / 43216		

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E&E FIT, Federal and State files
site inspection 5/16/90

EPA FORM 2070-13 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OOO446742

II. PAST RESPONSE ACTIVITIES

01 ☐ A. WATER SUPPLY CLOSED 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ B. TEMPORARY WATER SUPPLY PROVIDED 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ C. PERMANENT WATER SUPPLY PROVIDED 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ D. SPILLED MATERIAL REMOVED 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ E. CONTAMINATED SOIL REMOVED 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ F. WASTE REPACKAGED 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ G. WASTE DISPOSED ELSEWHERE 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ H. ON SITE BURIAL 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ I. IN SITU CHEMICAL TREATMENT 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ J. IN SITU BIOLOGICAL TREATMENT 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ K. IN SITU PHYSICAL TREATMENT 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ L. ENCAPSULATION 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ M. EMERGENCY WASTE TREATMENT 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ N. CUTOFF WALLS 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ O. EMERGENCY DIKING/SURFACE WATER DIVERSION 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ P. CUTOFF TRENCHES/SUMP 04 DESCRIPTION: NA	02 DATE	03 AGENCY
01 ☐ Q. SUBSURFACE CUTOFF WALL 04 DESCRIPTION: NA	02 DATE	03 AGENCY

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	D004465142

II PAST RESPONSE ACTIVITIES (Continued)

01 ☐ R. BARRIER WALLS CONSTRUCTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ S. CAPPING/COVERING — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ T. BULK TANKAGE REPAIRED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ U. GROUT CURTAIN CONSTRUCTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ V. BOTTOM SEALED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ W. GAS CONTROL — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ X. FIRE CONTROL — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ Y. LEACHATE TREATMENT — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ Z. AREA EVACUATED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ 1. ACCESS TO SITE RESTRICTED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ 2. POPULATION RELOCATED — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

01 ☐ 3. OTHER REMEDIAL ACTIVITIES — 02 DATE _____ — 03 AGENCY _____
04 DESCRIPTION
NA

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E & E FIT, Federal and State files
site inspection 5/16/90

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	D004465742

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION ☐ YES ☒ NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

NA

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

E+E FIT, Federal and State files
site inspection 5/16/90

EPA FORM 2070-13 (7-81)

APPENDIX D

FIT SITE PHOTOGRAPHS

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge + MFG. Company PAGE 1 OF 18

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: F0H0625SA

DATE: 5-16-90

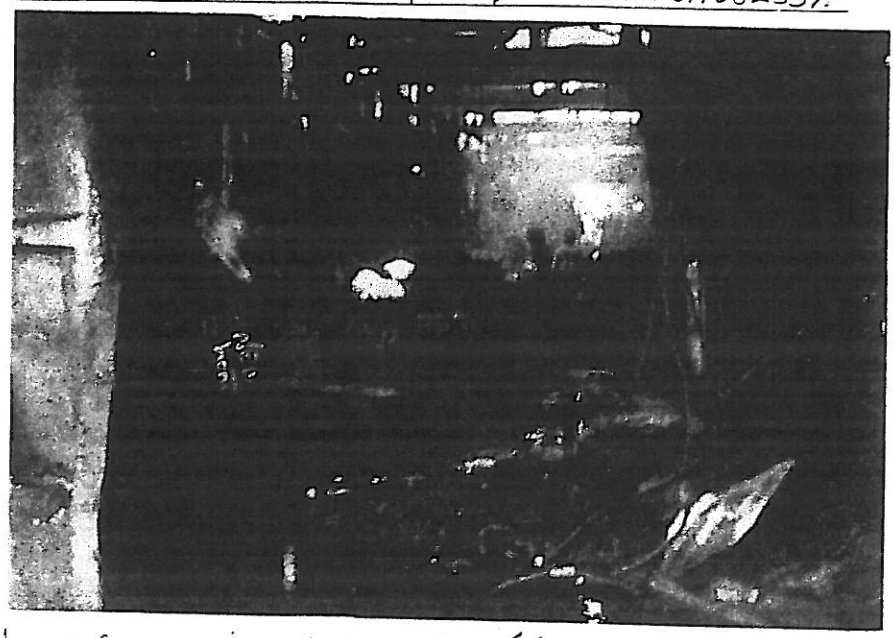
TIME: 0945

DIRECTION OF PHOTOGRAPH: North

WEATHER CONDITIONS: 50's cloudy, some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (IF applicable): NA



DESCRIPTION: Inside Main Forge building.

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge + MFG. Co. PAGE 2 OF 18

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: FOH0255SA

DATE: 5/16/90

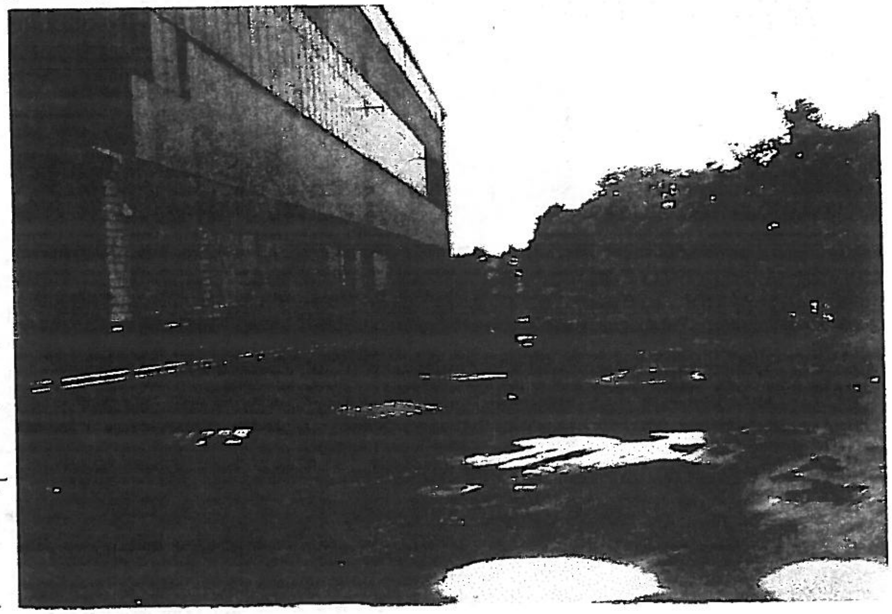
TIME: 235

DIRECTION OF PHOTOGRAPH: West

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



DESCRIPTION: North side of CDF plant.

DATE: 5/16/90

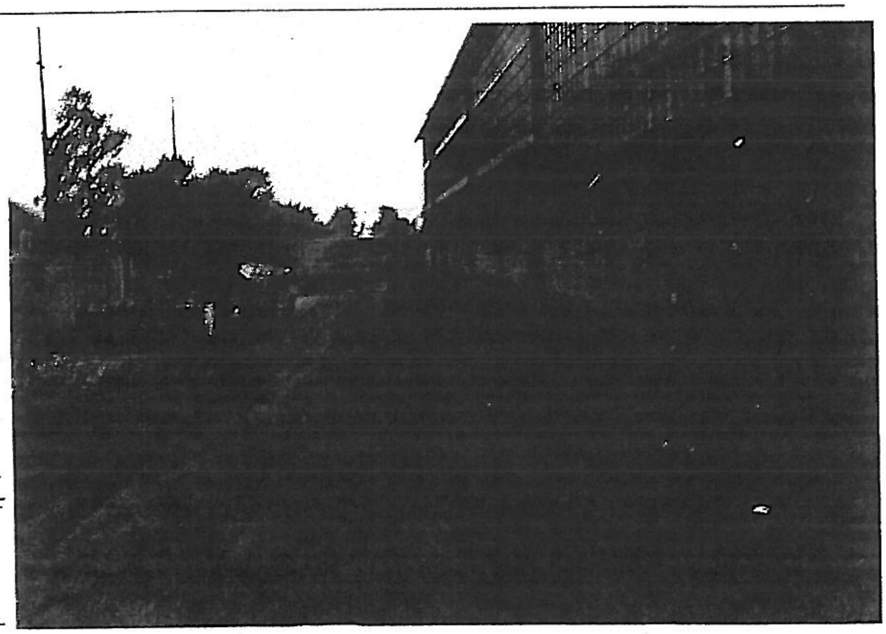
TIME: 1240

DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



DESCRIPTION: Same as above. Note house on left side of picture.

FIELD PHOTOGRAPHT LOG SHEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 3 OF 15

U.S. EPA ID: OHD004454412 TDD: F05-9004-001 PAN: F[illegible]25A

DATE: 5/16 '96

TIME: 550

DIRECTION OF PHOTOGRAPH: North East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A

DESCRIPTION: East by guard house (east exit).

DATE: 5/16/96

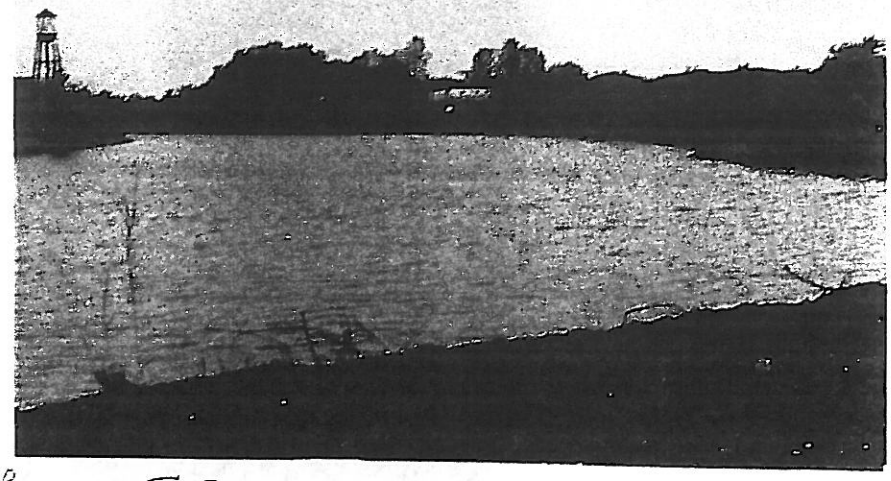
TIME: 3:30

DIRECTION OF PHOTOGRAPH: east

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



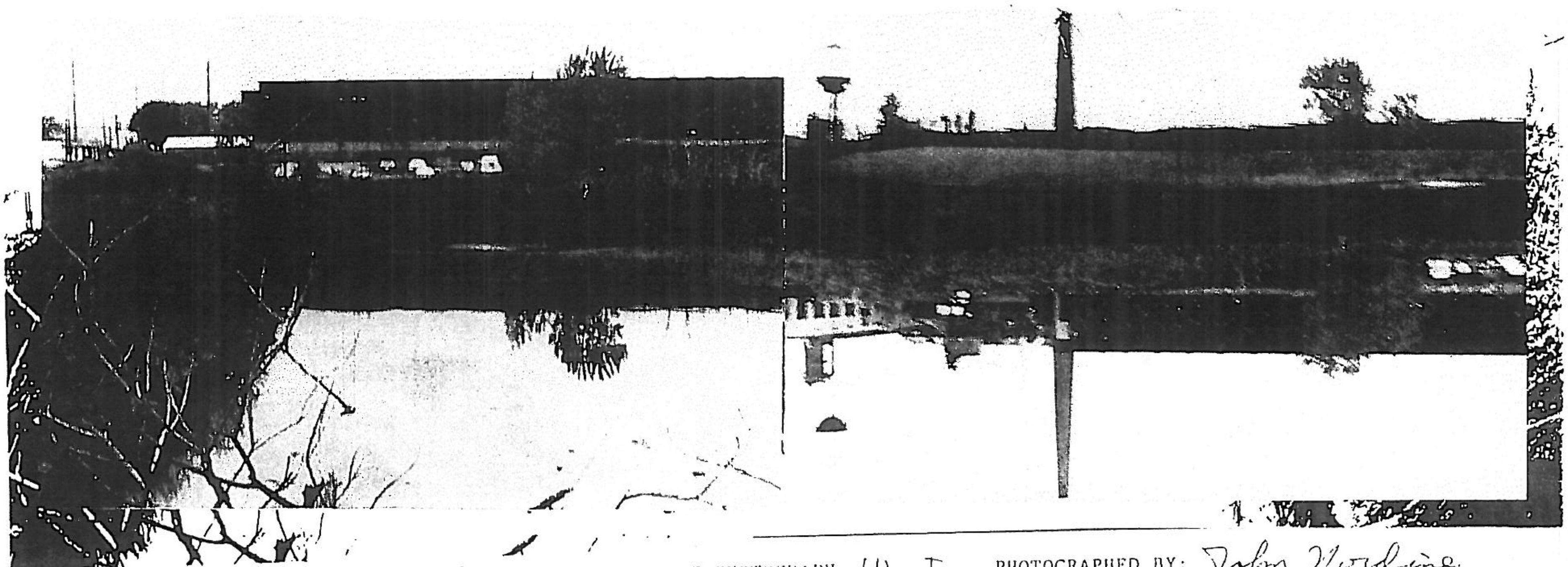
DESCRIPTION: Exposure #3

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge & Mfg. Company

PAN: FOH0625SA

U.S. EPA ID: OHD004465412 TDD: F05-9004-001



DATE: 5-16-90 TIME: 1500 DIRECTION OF PHOTOGRAPH: West PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A

WEATHER CONDITIONS: 50's cloudy, some rain

DESCRIPTION: Lagoon #2 with plant in background

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge / MFS Co. PAGE 5 OF 19

U.S. EPA ID: OHD004465412 TDD: F05-9010-001 PAN: FOH0625SA

DATE: 1/16/90

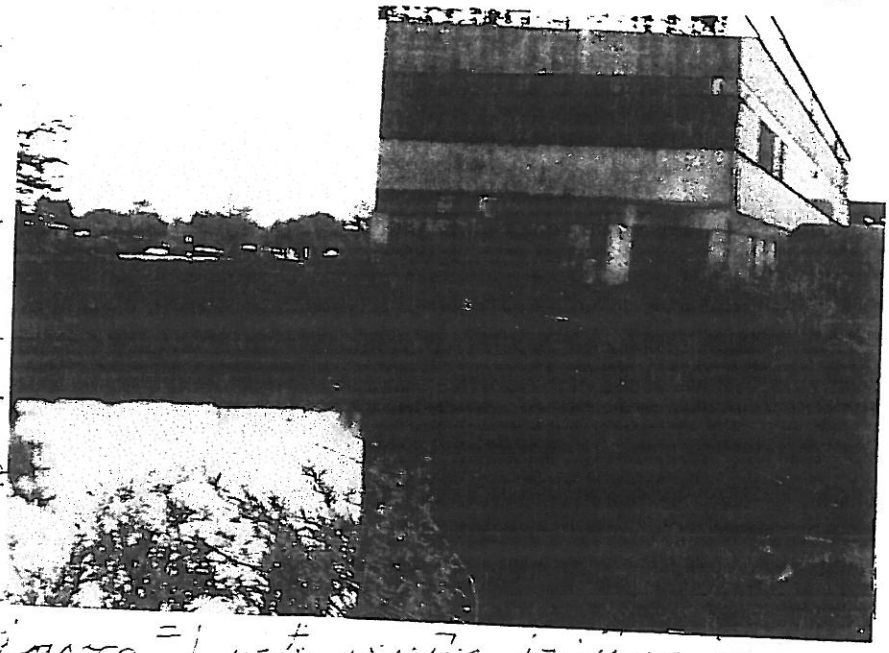
TIME: 40

DIRECTION OF PHOTOGRAPH: North

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



DESCRIPTION: Person #1 with visitor badge in background.

DATE: 1/16/90

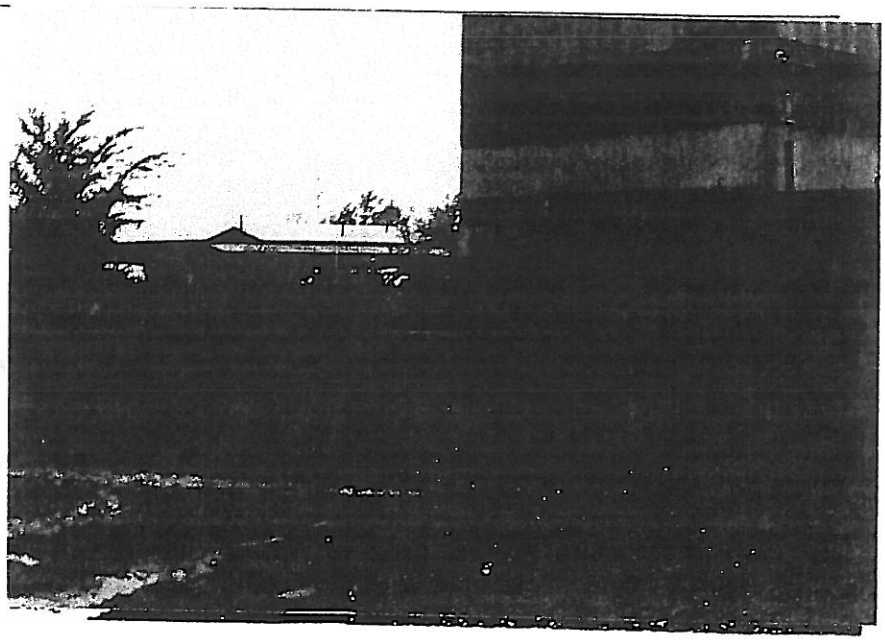
TIME: 140

DIRECTION OF PHOTOGRAPH: North

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



DESCRIPTION: Waste oil tanks in region #1.

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge + MFG. Co. PAGE - OF 15

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: F0H0625SA

DATE: 5/6/90

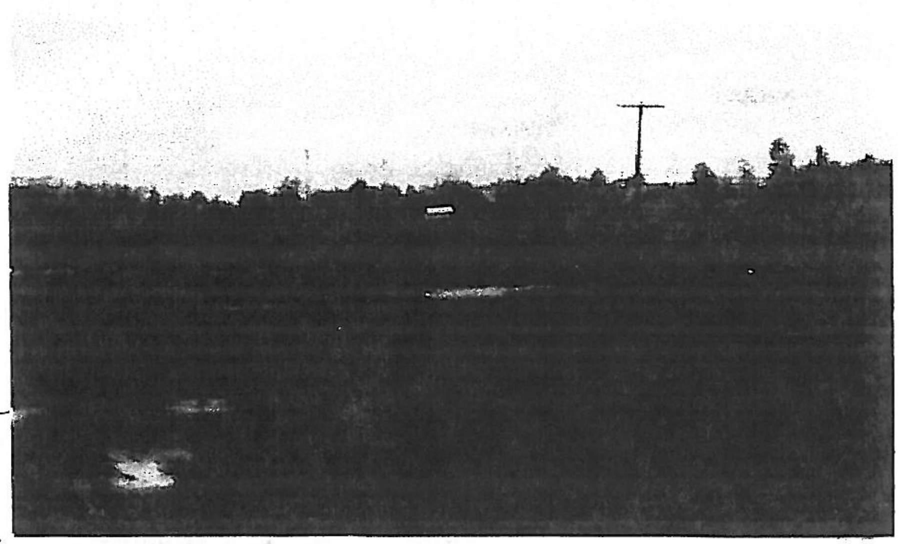
TIME: 1550

DIRECTION OF PHOTOGRAPH: east

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



DESCRIPTION: [illegible] area west of the [illegible] building. [illegible] fresh [illegible]

DATE: 5/6/90

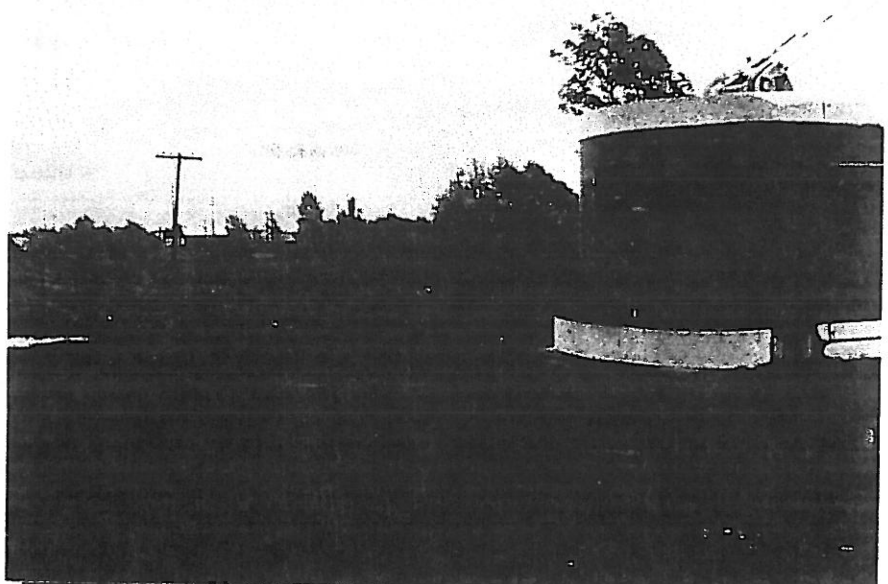
TIME: 1550

DIRECTION OF PHOTOGRAPH: east

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): N/A



DESCRIPTION: Same as above.

FIELD PHOTOGRAPH LOG SHEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 7 OF 18

U.S. EPA ID: OHD044641412 TDD: F05-9004-001 PAN: FOHG255A

DATE: 5/16/00

TIME: 515

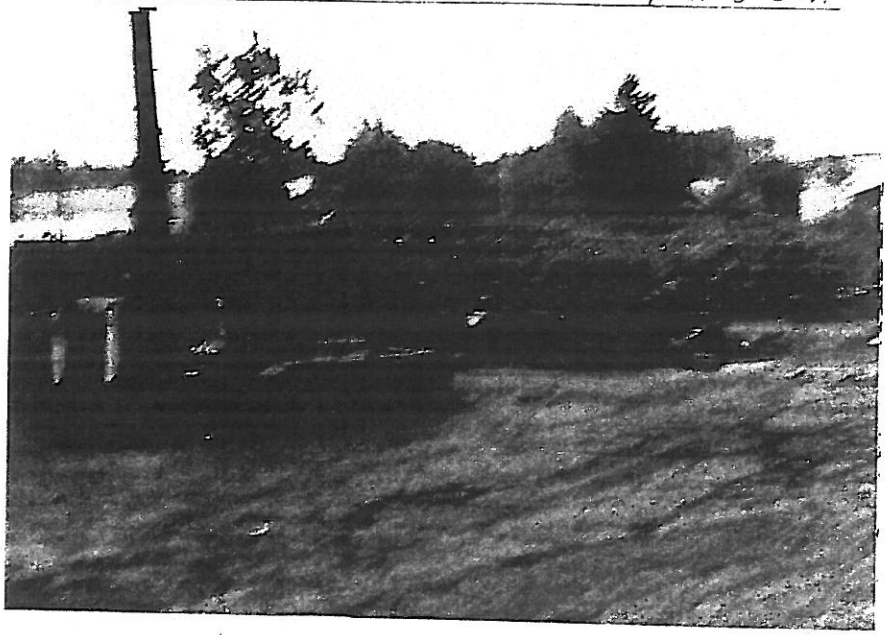
DIRECTION OF PHOTOGRAPH: West East

WEATHER CONDITIONS: 50's cloudy

some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): 1.F



DESCRIPTION: [illegible]

DATE: 5/16/00

TIME: 515

DIRECTION OF PHOTOGRAPH: West East

WEATHER CONDITIONS: 50's cloudy

some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable):

DESCRIPTION: [illegible]

FIELD PHOTOGRAPH LOG SHEET

SITE NAME: Canton Drop Forge MFG. Co. PAGE 5 OF 19

U.S. EPA ID: OHD004654 2 TDD: F05-9004-001 PAN: For 6255A

DATE: 5/16/90

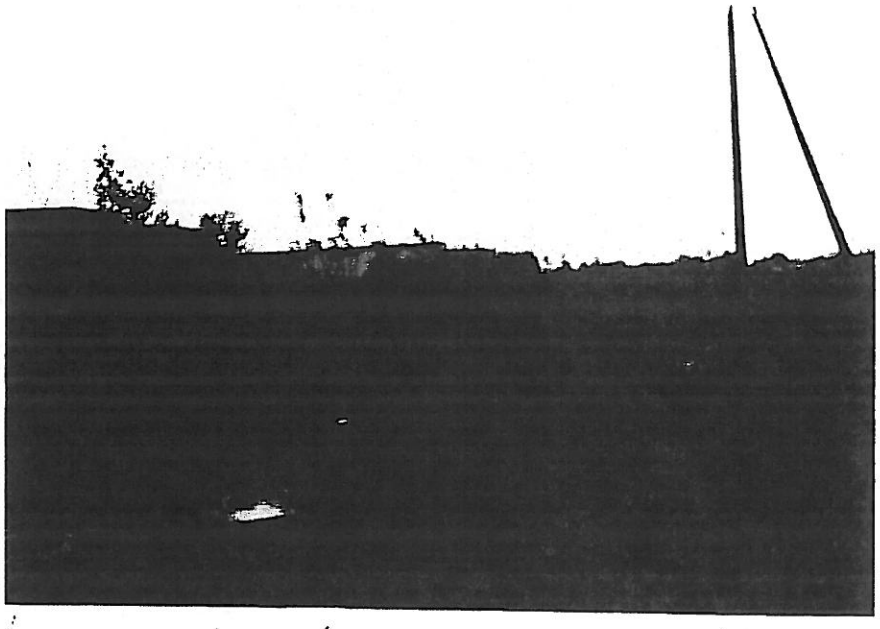
TIME: 515

DIRECTION OF PHOTOGRAPH: E.T.

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): NA



DESCRIPTION: Drum in storage area.

DATE: 5/16/90

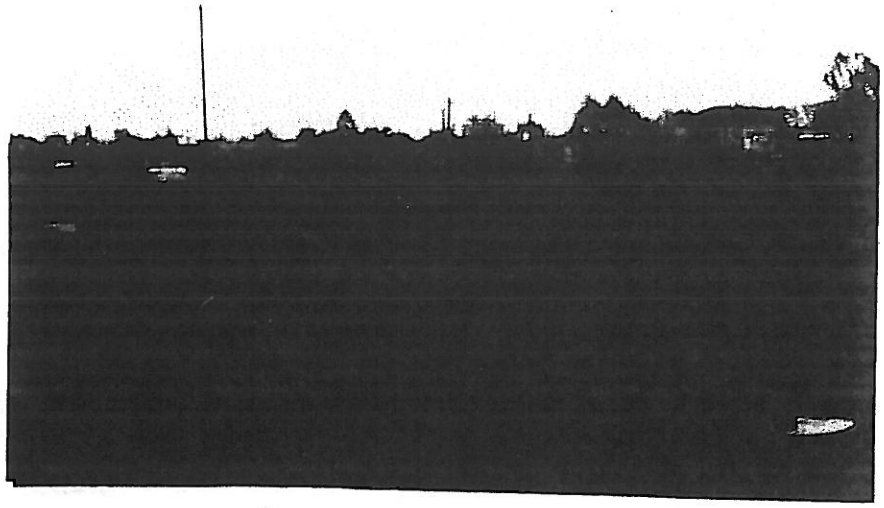
TIME: 1515

DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): NA



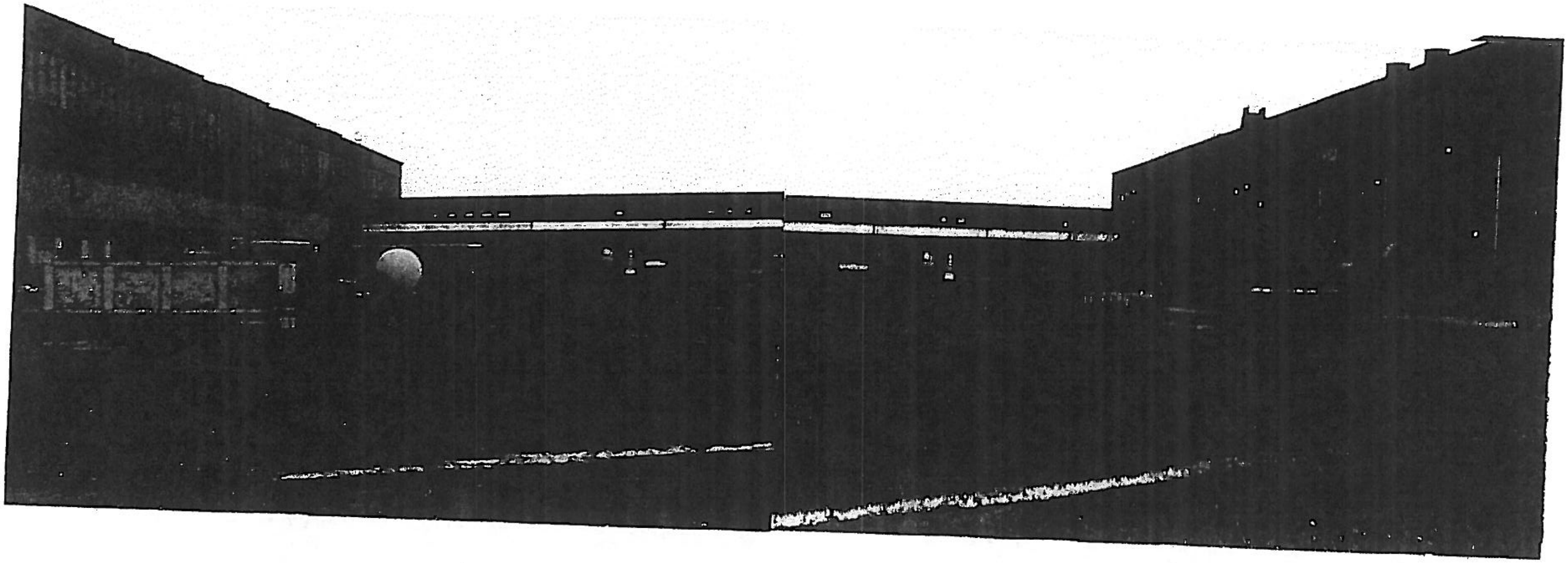
DESCRIPTION: Drums in area

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge + MFG. Company

U.S. EPA ID: OHD004465412 TDD: F05-9004-001

PAN: F0110G2551



DATE: > 5/16/90 TIME: > 1140 DIRECTION OF PHOTOGRAPH: > North PHOTOGRAPHED BY: > John Nordine

WEATHER CONDITIONS: > 50's cloudy, ~~some~~ rain SAMPLE ID (if applicable): > NA

DESCRIPTION: > Area between upsetter and main forge area. In this area, the underground storage tank and drum storage area are located.

FIELD PHOTOGRAPHT LOG SHEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 10 OF 18

U.S. EPA ID: OHD044-5412 TDD: F05-9004-001 PAN: FSHG25SA

DATE: 7/16/90

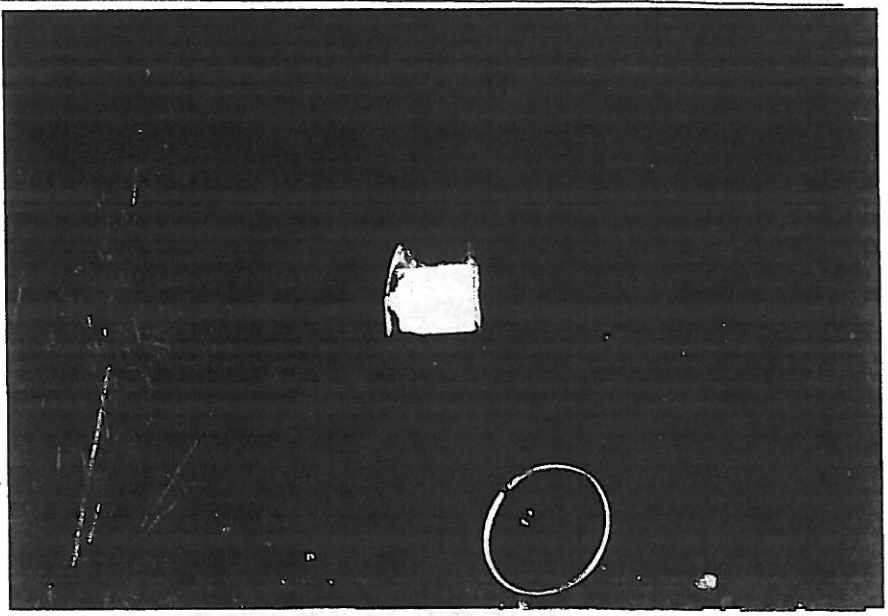
TIME: 11:30

DIRECTION OF PHOTOGRAPH: Northwest

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S1



DESCRIPTION: Sediment sample S1 from inside #1.

DATE: 7/16/90

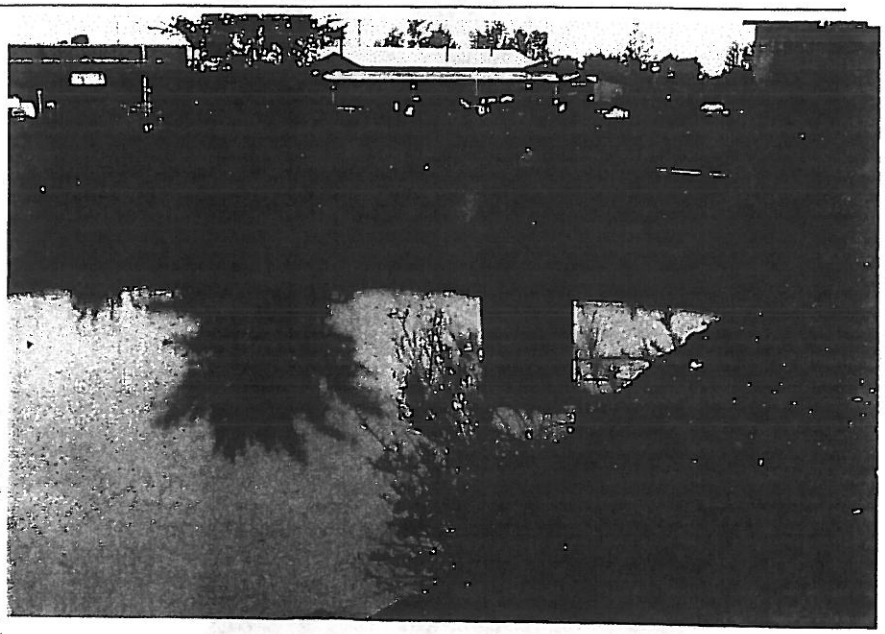
TIME: 1130

DIRECTION OF PHOTOGRAPH: Northwest

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-1



DESCRIPTION: Same as above

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge + MFG. Co. PAGE 11 OF 18

U.S. EPA ID: OHD004654132 TDD: F05-9004-001 PAN: For 0625SA

DATE: 5/16/90

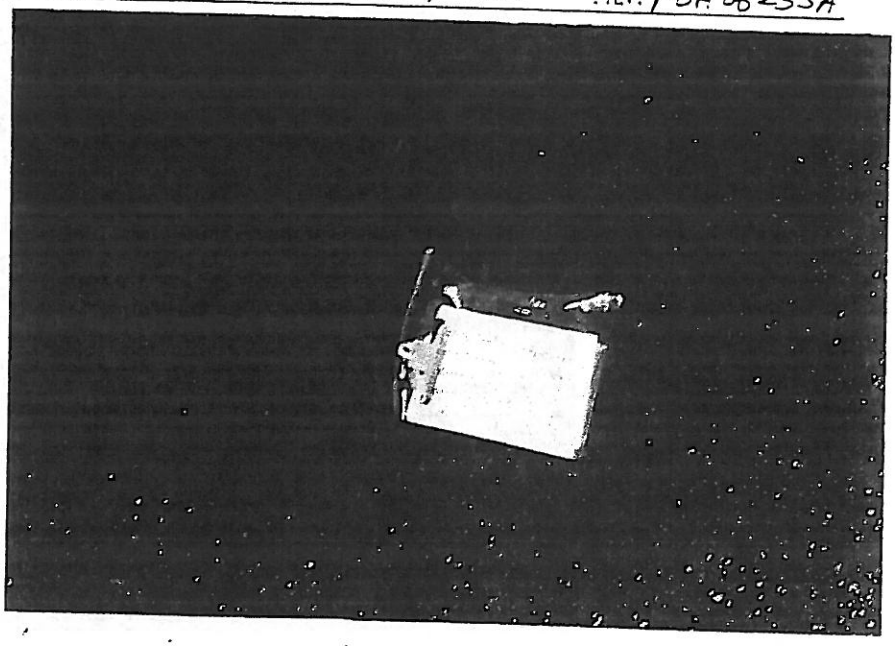
TIME: 1145

DIRECTION OF PHOTOGRAPH: Northwest

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-2



DESCRIPTION: Soil sample S-2 from side of the rear-loader.

DATE: 5/16/90

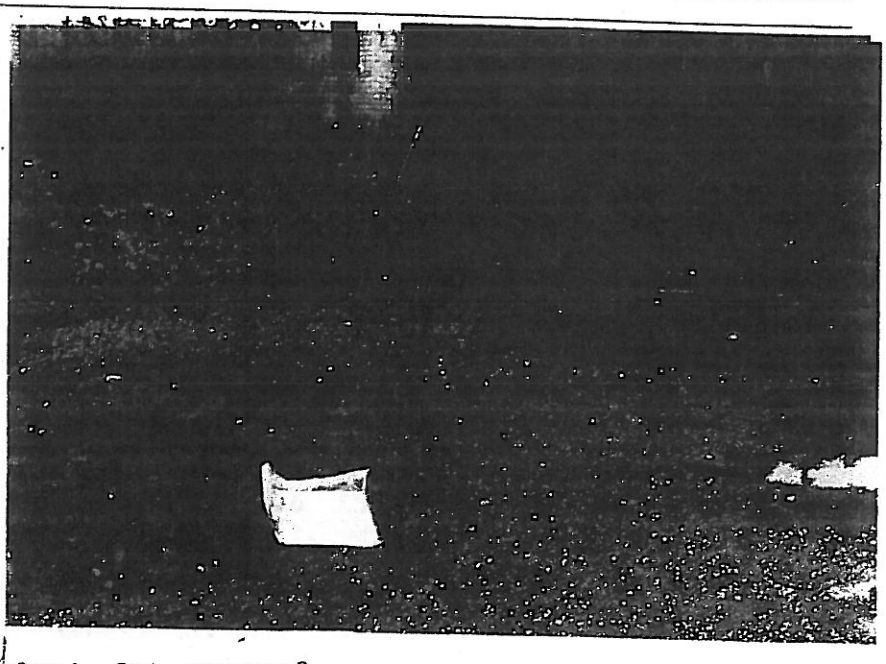
TIME: 1145

DIRECTION OF PHOTOGRAPH: Northwest

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-2



DESCRIPTION: Lack of wire.

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 12 OF 18

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: FOH0625SA

DATE: 5/16/90

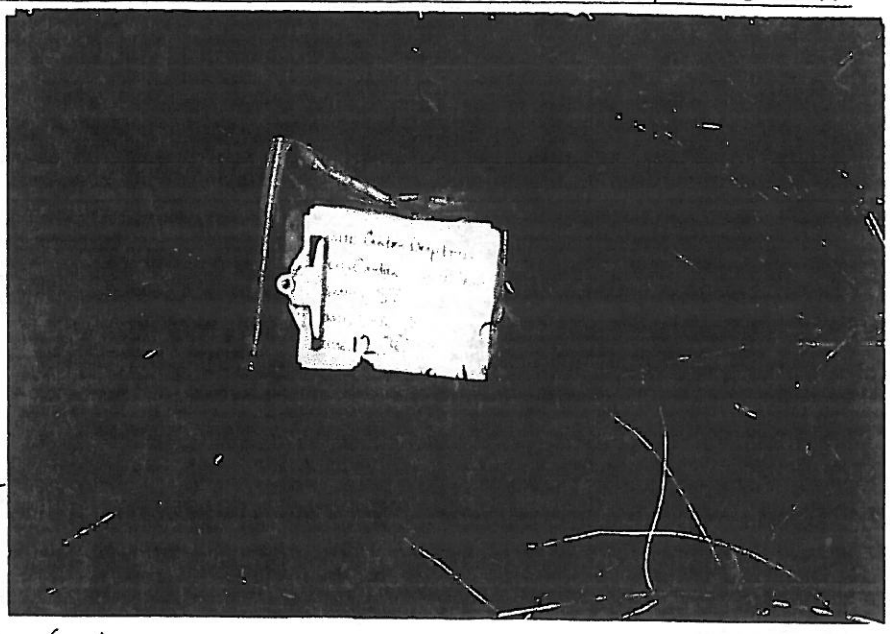
TIME: 235

DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-3



DESCRIPTION: Soil sample S-3 exist. near dike in northwest corner of the G.T.E. property.

DATE: 5/16/90

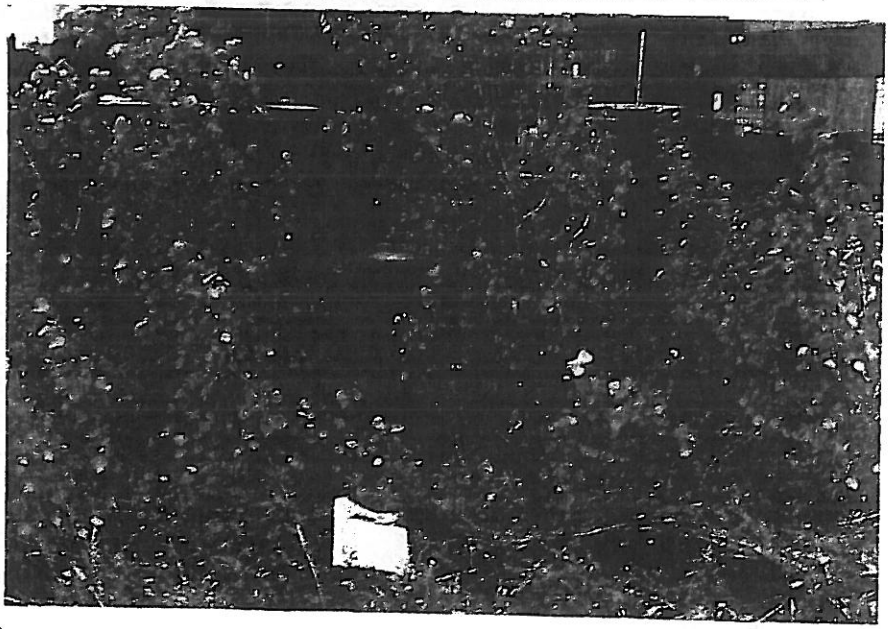
TIME: 235

DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-3



DESCRIPTION: Same as above

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge & Mfg. Co. PAGE 13 OF 18

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: FOH0625SA

DATE: 5/16/90

TIME: 330

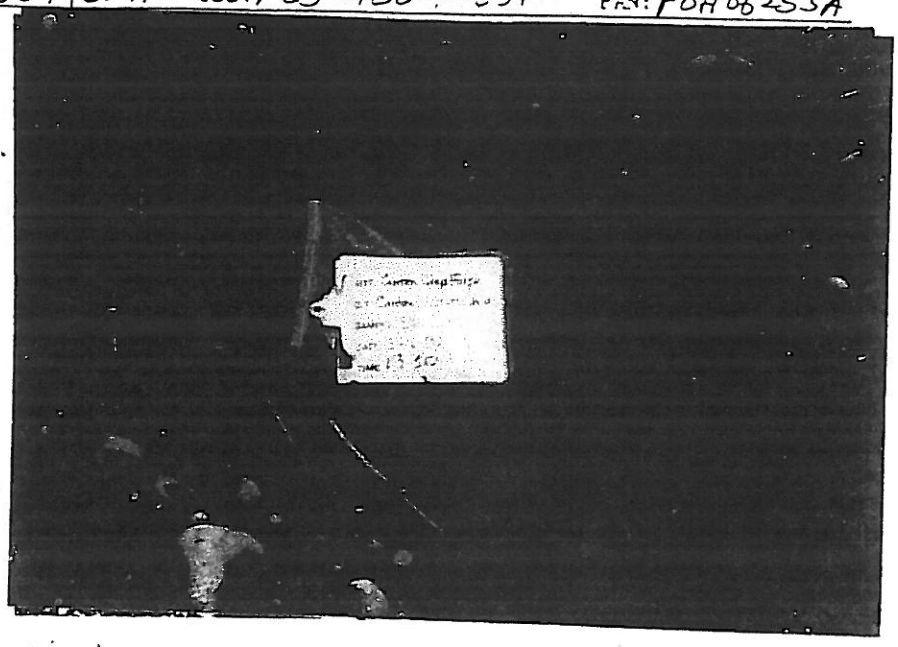
DIRECTION OF PHOTOGRAPH: West

WEATHER CONDITIONS: 50's cloudy

some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-4



DESCRIPTION: Soil Sample S-4 west in L. Lagoon #3.

DATE: 5/16/90

TIME: 330

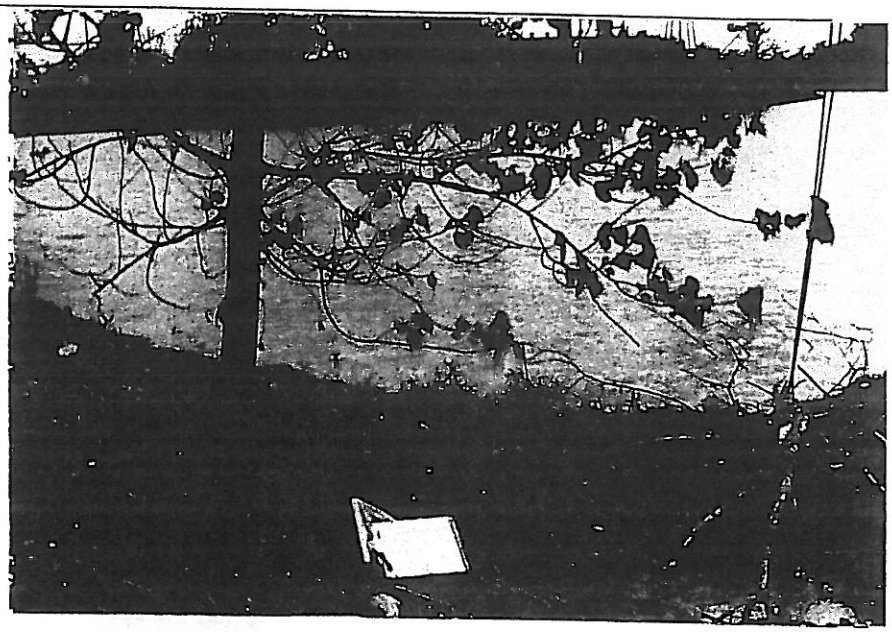
DIRECTION OF PHOTOGRAPH: West

WEATHER CONDITIONS: 50's - cloudy

some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-4

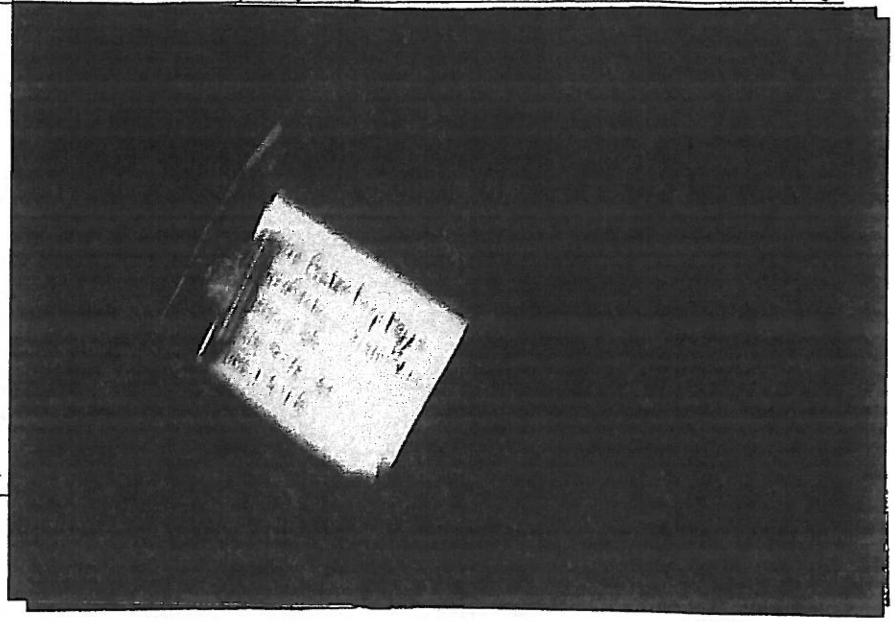


DESCRIPTION: Same as above.

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge + MFG. Co. PAGE 4 OF 18

U.S. EPA ID: O-DOO-4465412 TDD: F05-9004-0?? PAN: FOH06255A



DATE: 5/16/??

TIME: 13??

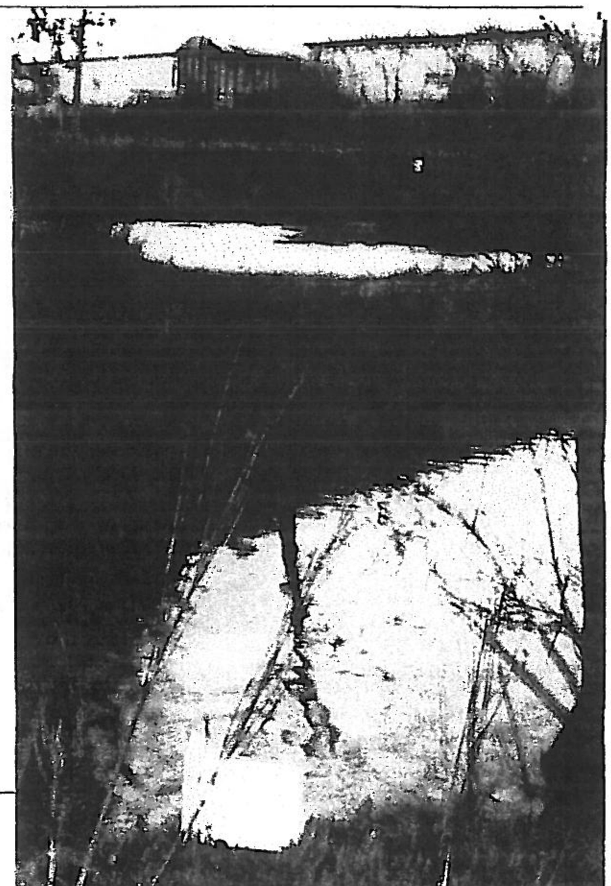
DIRECTION OF PHOTOGRAPH: Northeast

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-5

DESCRIPTION: Sediment sample S-5 collected near the inlet in lagoon #3 from lagoon #2.



DATE: 5-16-??

TIME: 1335

DIRECTION OF PHOTOGRAPH: Northeast

WEATHER CONDITIONS: 50's cloudy, some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-5

DESCRIPTION:

Same as above.

SI011(2/25/89

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 15 OF 18

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: FOH0625SA

DATE: 5/16/90

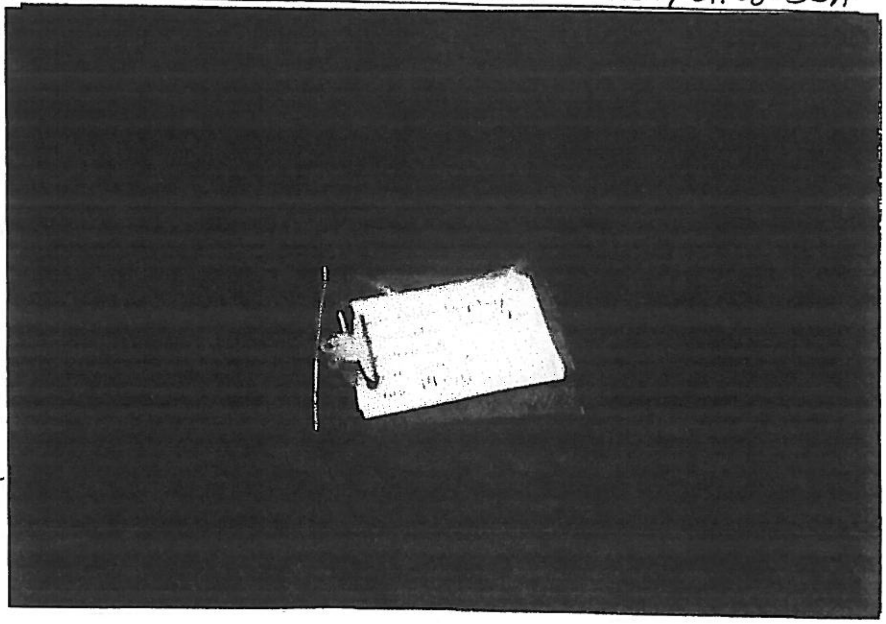
TIME: 1400

DIRECTION OF PHOTOGRAPH: South

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-5



DESCRIPTION: Soil sample S-5 collected from zone A landfill cover material. Oil sheen on water.

DATE: 5/16/90

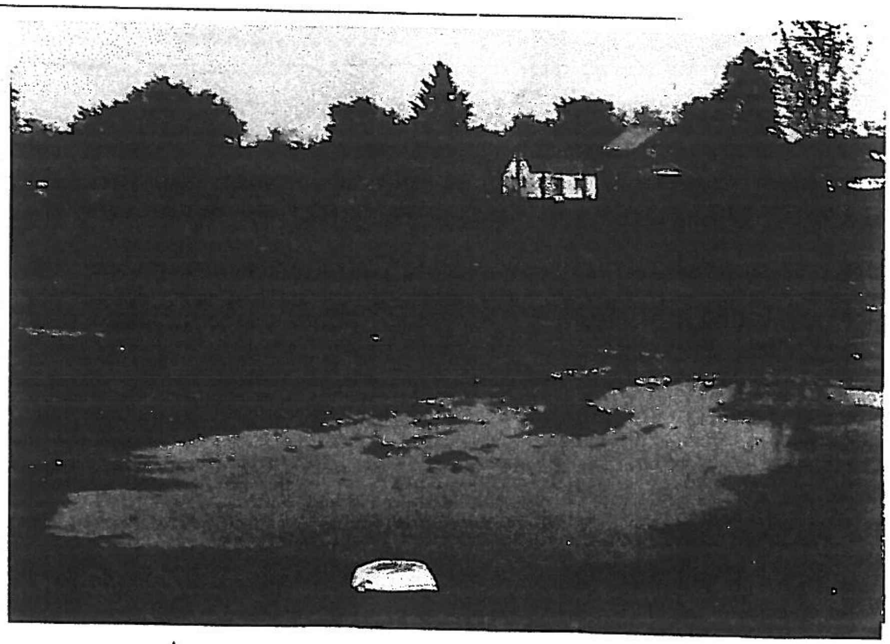
TIME: 1400

DIRECTION OF PHOTOGRAPH: South

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-6



DESCRIPTION: Same as above, note fresh cover

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge & MFG Co. PAGE 16 OF 19

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: FOH0625SA

DATE: 5/16/90

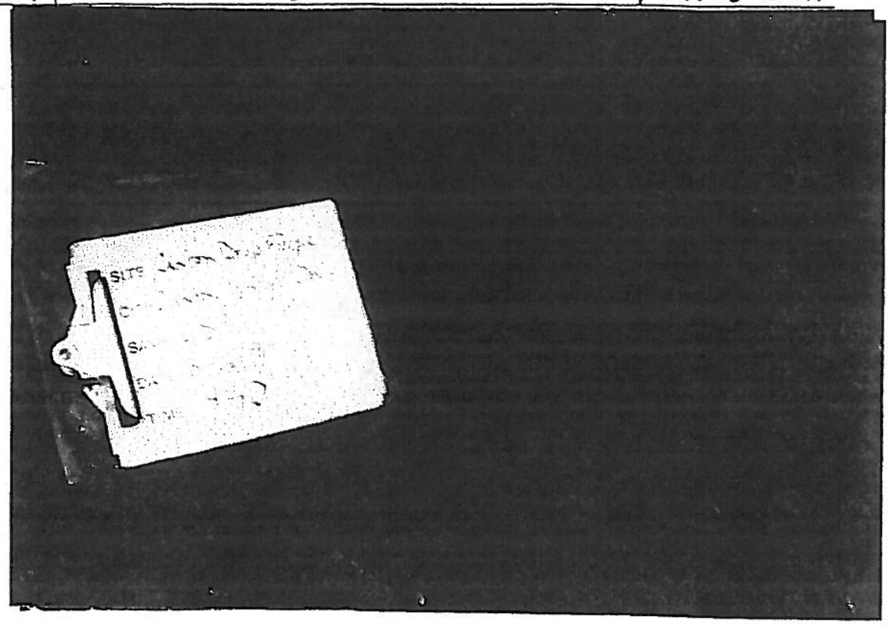
TIME: 1440

DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-7



DESCRIPTION: Soil sample S-7 collected near the pump check on lagoon #2. Note the substance on the bank.

DATE: 5/16/90

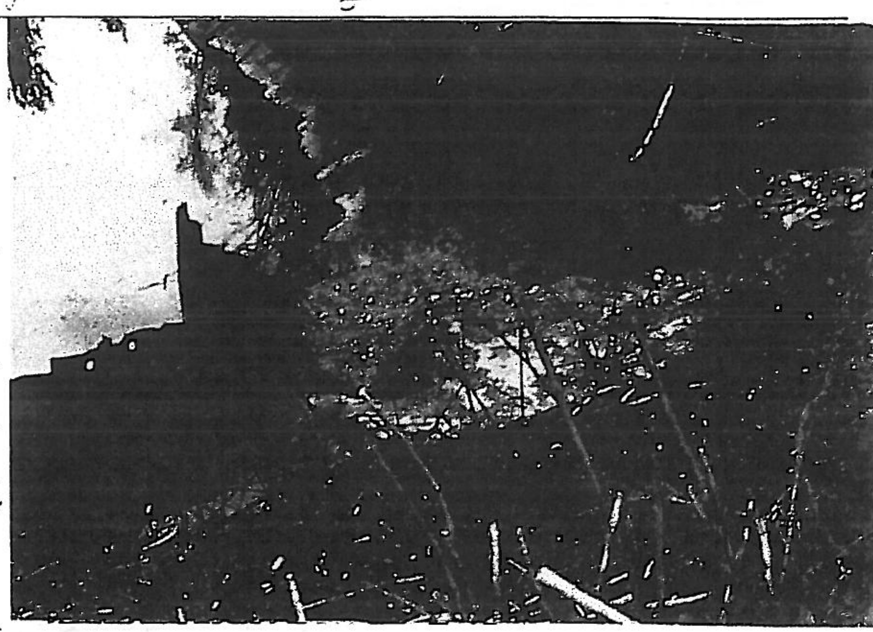
TIME: 1440

DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-7



DESCRIPTION: Same as above.

FIELD PHOTOGRAPHY LOG SHEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 17 OF 18

U.S. EPA ID: OHD004465412 TDD: F05-9004-001 PAN: FOH06255A

DATE: 5/16/90

TIME: 450

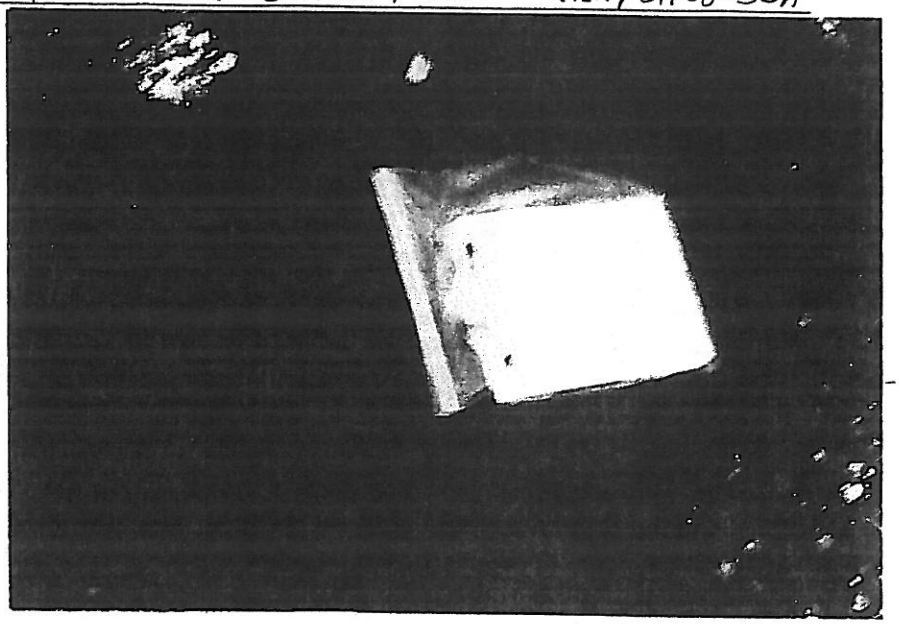
DIRECTION OF PHOTOGRAPH: East

WEATHER CONDITIONS: 50's cloudy

some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-8



DESCRIPTION: Soil sample S-8 collected from swamp

area.

DATE: 5/16/90

TIME: 450

DIRECTION OF PHOTOGRAPH: South

WEATHER CONDITIONS: 50's cloudy

some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-9

DESCRIPTION: Same as above.

FIELD PHOTOGRAPHT LOG SEEET

SITE NAME: Canton Drop Forge & MFG. Co. PAGE 15 OF 18

U.S. EPA ID: OHDOC4465412 TDD: F05-9004-001 PAN: FOH0625SA

DATE: 5/16/90

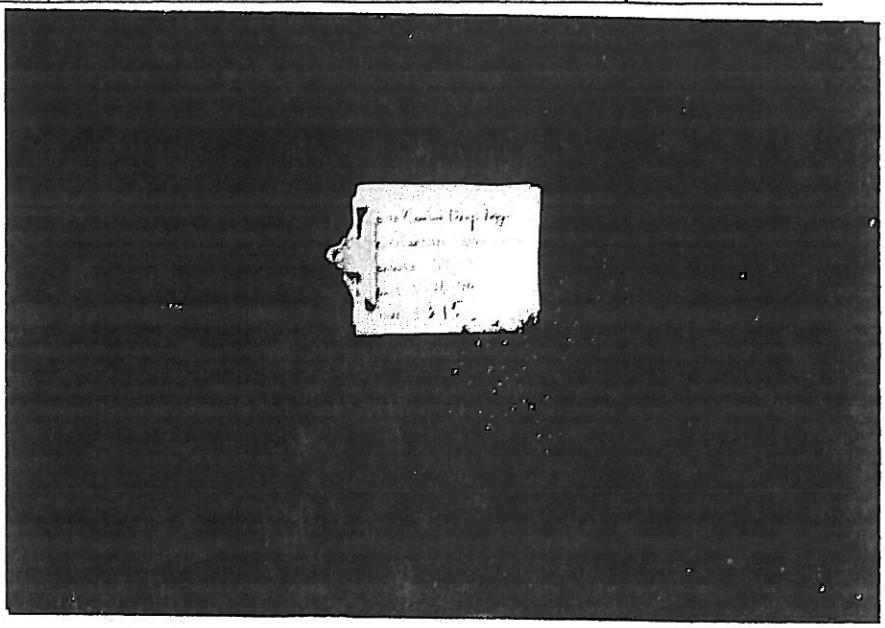
TIME: 1315

DIRECTION OF PHOTOGRAPH: North

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-9



DESCRIPTION: In sample S-9 visible near the white writing.

DATE: 5/16/90

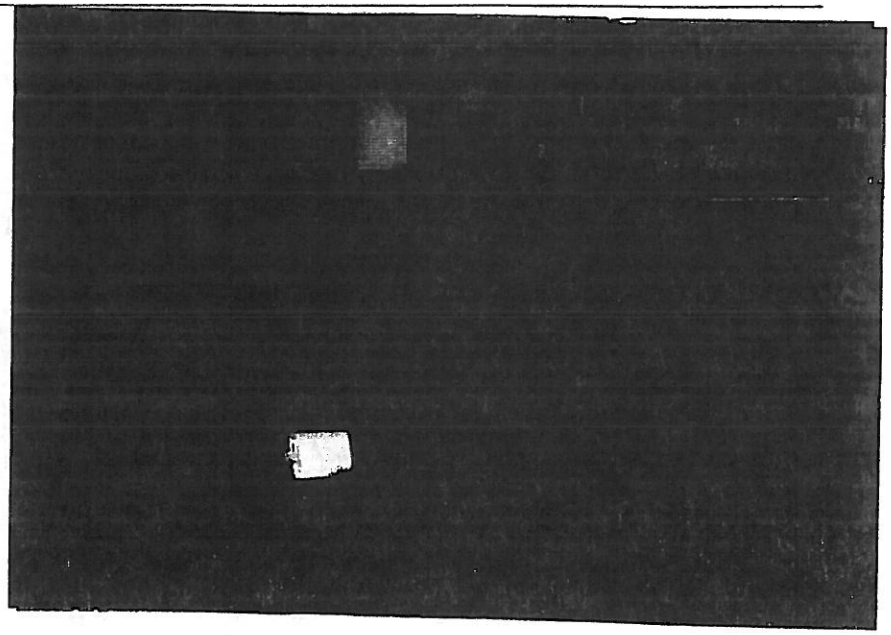
TIME: 1315

DIRECTION OF PHOTOGRAPH: North

WEATHER CONDITIONS: 50's cloudy some rain

PHOTOGRAPHED BY: John Nordine

SAMPLE ID (if applicable): S-19



DESCRIPTION: Same as above.

APPENDIX E

U.S. EPA TARGET COMPOUND LIST AND TARGET ANALYTE LIST QUANTITATION/DETECTION LIMITS

Contract Laboratory Program
Target Compound List
Quantitation Limits

COMPOUND	CAS #	WATER	SOIL SEDIMENT SLUDGE
Chloromethane	74-87-3	10 ug/L	10 ug/Kg
Bromomethane	74-83-9	10	10
Vinyl chloride	75-01-4	10	10
Chloroethane	75-00-3	10	10
Methylene chloride	75-09-2	5	5
Acetone	67-64-1	10	5
Carbon disulfide	75-15-0	5	5
1,1-dichloroethene	75-35-4	5	5
1,1-dichloroethane	75-34-3	5	5
1,2-dichloroethene (total)	540-59-0	5	5
Chloroform	67-66-3	5	5
1,2-dichloroethane	107-06-2	5	5
2-butanone (MEK)	78-93-3	10	10
1,1,1-trichloroethane	71-55-6	5	5
Carbon tetrachloride	56-23-5	5	5
Vinyl acetate	108-05-4	10	10
Bromodichloromethane	75-27-4	5	5
1,2-dichloropropane	78-87-5	5	5
cis-1,3-dichloropropene	10061-01-5	5	5
Trichloroethene	79-01-6	5	5
Dibromochloromethane	124-48-1	5	5
1,1,2-trichloroethane	79-00-5	5	5
Benzene	71-43-2	5	5
Trans-1,3-dichloropropene	10061-02-6	5	5
Bromoform	75-25-2	5	5
4-Methyl-2-pentanone	108-10-1	10	10
2-Hexanone	591-78-6	10	10
Tetrachloroethene	127-18-4	5	5
Tolene	108-88-3	5	5
1,1,2,2-tetrachloroethane	79-34-5	5	5
Chlorobenzene	108-90-7	5	5
Ethyl benzene	100-41-4	5	5
Styrene	100-42-5	5	5
Xylenes (total)	1330-20-7	5	5

Table A
Contract Laboratory Program
Target Compound List
Semivolatiles Quantitation Limits

COMPOUND	CAS #	WATER	SOIL SEDIMENT SLUDGE
Phenol	108-95-2	10 ug/L	330 ug/Kg
bis(2-Chloroethyl) ether	111-44-4	10	330
2-Chlorophenol	95-57-8	10	330
1,3-Dichlorobenzene	541-73-1	10	330
1,4-Dichlorobenzene	106-46-7	10	330
Benzyl Alcohol	100-51-6	10	330
1,2-Dichlorobenzene	95-50-1	10	330
2-Methylphenol	95-48-7	10	330
bis(2-Chloroisopropyl) ether	108-60-1	10	330
4-Methylphenol	106-44-5	10	330
N-Nitroso-di-n-dipropylamine	621-64-7	10	330
Hexachloroethane	67-72-1	10	330
Nitrobenzene	98-95-3	10	330
Isophorone	78-59-1	10	330
2-Nitrophenol	88-75-5	10	330
2,4-Dimethylphenol	105-67-9	10	330
Benzoic Acid	65-85-0	50	1600
bis(2-Chloroethoxy) methane	111-91-1	10	330
2,4-Dichlorophenol	120-83-2	10	330
1,2,4-Trichlorobenzene	120-82-1	10	330
Naphthalene	91-20-3	10	330
4-Chloroaniline	106-47-8	10	330
Hexachlorobutadiene	87-68-3	10	300
4-Chloro-3-methylphenol	59-50-7	10	330
2-Methylnaphthalene	91-57-6	10	330
Hexachlorocyclopentadiene	77-47-4	10	330
2,4,6-Trichlorophenol	88-06-2	10	330
2,4,5-Trichlorophenol	95-95-4	50	1600
2-Chloronaphthalene	91-58-7	10	330
2-Nitroaniline	88-74-4	50	1600
Dimethylphthalate	131-11-3	10	330
Acenaphthylene	208-96-8	10	330
2,6-Dinitrotoluene	606-20-2	10	330
3-Nitroaniline	99-09-2	50	1600
Acenaphthene	83-32-9	10	330
2,4-Dinitrophenol	51-28-5	50	1600
4-Nitrophenol	100-02-7	50	1600
Dibenzofuran	132-64-9	10	330
2,4-Dinitrotoluene	121-14-2	10	330
Diethylphthalate	84-66-2	10	330
4-Chlorophenyl-phenyl ether	7005-72-3	10	330

Table A
Contract Laboratory Program
Target Compound List
Semivolatiles Quantitation Limits

COMPOUND	CAS #	WATER	SOIL SLUDGE SEDIMENT
Fluorene	86-73-7	10 ug/L	330 ug/Kg
4-Nitroaniline	100-01-6	50	1600
4,6-Dinitro-2-methylphenol	534-52-1	50	1600
N-nitrosodiphenylamine	86-30-6	10	330
4-Bromophenyl-phenylether	101-55-3	10	330
Hexachlorobenzene	118-74-1	10	330
Pentachlorophenol	87-86-5	50	1600
Phenanthrene	85-01-8	10	330
Anthracene	120-12-7	10	330
Di-n-butylphthalate	84-74-2	10	330
Fluoranthene	206-44-0	10	330
Pyrene	129-00-0	10	330
Butylbenzylphthalate	85-68-7	10	330
3,3'-Dichlorobenzidine	91-94-1	20	660
Benzo(a)anthracene	56-55-3	10	330
Chrysene	218-01-9	10	330
bis(2-Ethylhexyl)phthalate	117-81-7	10	330
Di-n-octylphthalate	117-84-0	10	330
Benzo(b)fluoranthene	205-99-2	10	330
Benzo(k)fluoranthene	207-08-9	10	330
Benzo(a)pyrene	50-32-8	10	330
Indeno(1,2,3-cd)pyrene	193-39-5	10	330
Dibenz(a,h)anthracene	53-70-3	10	330
Benzo(g,h,i)perylene	191-24-2	10	330

Table A
Contract Laboratory Program
Target Compound List
Pesticide and PCB Quantitation Limits

COMPOUND	CAS #	WATER	SOIL SEDIMENT SLUDGE
alpha-BHC	319-84-6	0.05 ug/L	8 ug/Kg
beta-BHC	319-85-7	0.05	8
delta-BHC	319-86-8	0.05	8
gamma-BHC (Lindane)	58-89-9	0.05	8
Heptachlor	76-44-8	0.05	8
Aldrin	309-00-2	0.05	8
Heptachlor epoxide	1024-57-3	0.05	8
Endosulfan I	959-98-8	0.05	8
Dieldrin	60-57-1	0.10	16
4,4'-DDE	72-55-9	0.10	16
Endrin	72-20-8	0.10	16
Endosulfan II	33213-65-9	0.10	16
4,4'-DDD	72-54-8	0.10	16
Endosulfan sulfate	1031-07-8	0.10	16
4,4'-DDT	50-29-3	0.10	16
Methoxychlor (Mariate)	72-43-5	0.5	80
Endrin ketone	53494-70-5	0.10	16
alpha-Chlordane	5103-71-9	0.5	80
gamma-chlordane	5103-74-2	0.5	80
Toxaphene	8001-35-2	1.0	160
AROCLOR-1016	12674-11-2	0.5	80
AROCLOR-1221	11104-28-2	0.5	80
AROCLOR-1232	11141-16-5	0.5	80
AROCLOR-1242	53469-21-9	0.5	80
AROCLOR-1248	12672-29-6	0.5	80
AROCLOR-1254	11097-69-1	1.0	160
AROCLOR-1260	11096-82-5	1.0	160

TABLE A (Cont.)
CONTRACT LABORATORY PROGRAM
HAZARDOUS SUBSTANCE LIST (HSL)
INORGANIC DETECTION LIMITS

COMPOUND	PROCEDURE	DETECTION LIMITS		
		WATER	SOIL SEDIMENT SLUDGE	
ALUMINUM	ICP	200 ug/L	40	mg/KG
ANTIMONY	FURNACE	60	2.4	
ARSENIC	FURNACE	10	2	
BARIUM	ICP	200	40	
BERYLLIUM	ICP	5	1	
CADMIUM	ICP	5	1	
CALCIUM	ICP	5000	1000	
CHROMIUM	ICP	10	2	
COBALT	ICP	50	10	
COPPER	ICP	25	5	
IRON	ICP	100	20	
LEAD	FURNACE	5	1	
MAGNESIUM	ICP	5000	1000	
MANGANESE	ICP	15	3	
MERCURY	COLD VAPOR	0.2	0.008	
NICKEL	ICP	40	8	
POTASSIUM	ICP	5000	1000	
SELENIUM	FURNACE	5	1	
SILVER	ICP	10	2	
SODIUM	ICP	5000	1000	
THALLIUM	FURNACE	10	2	
TIN	ICP	40	8	
VANADIUM	ICP	50	10	
ZINC	ICP	20	4	
CYANIDE	COLOR	10	2	

APPENDIX F

WELL LOGS OF THE AREA OF THE SITE

WATER WELLS
AND
PUMPS

WELL SCREENS
AND
TEST HOLES

M. J. ENGEL DRILLING CO.

well log 1

MASSILLON, OHIO R. D. 2

PHONE MASSILLON [illegible]

DRILLED FOR The Canton Drop Forge and Manufacturing Co.

ADDRESS Canton, Ohio

DATE April 8, 1942

LOCATION 150 feet North of house on brick Canton-Massillon Rd.

250 feet from Pennsylvania Railroad.

Well #1

Thickness	Data	Total	Water Level
30 feet	gravel, sand, and clay	30 feet	
50 feet	sand and clay	80 feet	
10 feet	sand, clay and gravel	90 feet	
15 feet	gravel	105 feet	
19 feet	sand	124 feet	
15 feet	clay and sand	139 feet	
7 feet	sand rock	146 feet	71 feet

Set 31 feet of 10" perforated pipe for screen.

WATER WELLS and PUMPS

WELL SCREENS and TEST HOLES

M. J. ENGEL DRILLING CO.

well log 2

MASSILLON, OHIO, R. D. 2

PHONE: MASSILLON 3-1620

DRILLED FOR The Canton Drop Forge and Manufacturing Co.

ADDRESS Canton, Ohio

DATE June 7, 1943

LOCATION

well #1

Thickness	Strata	Total	Water Level
	Moved back, pulled screen, and drove 12" pipe to rock. Depth at start - 146 feet.		
2 feet	sand rock	148 feet	
4 feet	clay and sand	152 feet	
8 feet	shale and sand rock	160 feet	
20 feet	sand rock and shale	180 feet	
42 feet	soft black shale	222 feet	
2 feet	sand rock	224 feet	
10 feet	soft black shale	234 feet	
3 feet	sand rock	237 feet	
21 feet	soft black shale	265 feet	
17 feet	sand rock and shale	282 feet	
8 feet	sand rock	290 feet	
2 feet	shale	292 feet	
133 feet	sand rock	425 feet	75 feet

160 feet 12" drive pipe
Well was shot with 60 quarts of Nitro.

Measurements- ground level

LOCATED

WELL LOG AND DRILLING REPORT

State of Ohio
DEPARTMENT OF NATURAL RESOURCES
Division of Water
Columbus, Ohio

well log 3 ORIGINAL
No 95245

non-responsive

CONSTRUCTION DETAILS

Casing diameter 4" Length of casing 94'
Type of screen ..... Length of screen .....
Type of pump .....
Capacity of pump .....
Depth of pump setting .....

PUMPING TEST

Pumping rate ..... G.P.M. Duration of test ..... hrs.
Drawdown ..... ft. Date .....
Developed capacity .....
Static level—depth to water 70' ft.
Pump installed by .....

WELL LOG

Formations Sandstone, shale, limestone, gravel and clay	From	To
Sand + Gravel	0 Feet	40 Ft.
Brown sand	40'	60'
Sand + Gravel	60'	85'
Blue mud	85'	94'
Blue clay	94'	104'
White sandstone	104'	117'

SKETCH SHOWING LOCATION

Locate in reference to numbered State Highways, St. Intersections, County roads, etc.

non-responsive

Drilling Firm Holland + Keller
Address 4916, 2nd St NW, Canton
Date July 15, 1953
Signed John L Holland

3

WELL LOG AND DRILLING REPORT

ORIGINAL

well log 4
474500

NO CARBON PAPER NECESSARY – SELF-TRANSCRIBING

State of Ohio
DEPARTMENT OF NATURAL RESOURCES
Division of Geological Survey
Fountain Square
Columbus, Ohio 43224 Phone (614) 466-5344

non-responsive

CONSTRUCTION DETAILS

Casing diameter 5" Length of casing 126'
Type of screen — Length of screen —
Type of pump —
Capacity of pump —
Depth of pump setting —
Date of completion

BAILING OR PUMPING TEST
(Specify one by circling)

Test rate 15 gpm Duration of test 1 1/4
Drawdown 42 ft Date 1-2-76
Static level (depth to water) 121
Quality (clear, cloudy, taste, odor) CLEAR
Pump installed by —

WELL LOG*

Formations: sandstone, shale, limestone, gravel, clay	From	To
BROWN CLAY	0 ft	25 ft
LITE SHALE	25	51
LIMESTONE	51	54
COAL	54	56
LITE SHALE	55	72
GRAY SHALE	72	112
LIMESTONE	112	115
COAL	115	116
LITE SHALE	116	126
GRAY SHALE	126	137
LIMESTONE	137	139
SANDY SHALE	139	186
SANDSTONE	186	223

SKETCH SHOWING LOCATION

Locate in reference to numbered state highways, street intersections, county roads, etc.

non-responsive

DRILLING FIRM McGill Well Drilling
ADDRESS 601 34th St
Canton Ohio

DATE 1-2-76
SIGNED Ted McGill

*If additional space is needed to complete well log, use next consecutive numbered form.

WELL LOG AND DRILLING REPORT

State of Ohio
DEPARTMENT OF NATURAL RESOURCES
Division of Water
Fountain Square
Columbus, Ohio 43224

NO CARBON PAPER NECESSARY – SELF-TRANSCRIBING

620668
well log 5

[redacted]

CONSTRUCTION DETAILS

Casing diameter 7" 5" Length of casing 65 ft
Type of screen _____ Length of screen 150 ft
Type of pump _____
Capacity of pump _____
Depth of pump setting _____
Date of completion _____

BAILING OR PUMPING TEST
(specify one by circling)

Test rate 15 gpm Duration of test 2
Drawdown [illegible] ft Date Nov 2-82
Static level (depth to water) 60
Quality (clear, cloudy, taste, odor) Clear
Pump installed by _____

WELL LOG*

Formations: sandstone, shale, limestone, gravel, clay	From	To
Drift	0 ft	30 ft
Clay	30	65
Broken Limestone	65	70
Shale	70	120
Limestone	120	123
Shale	123	175
Sandrock	175	205
Shale	205	215

SKETCH SHOWING LOCATION

Locate in reference to numbered state highways, street intersections, county roads, etc.

[redacted]

DRILLING FIRM Williams Well Drilling DATE Nov 2 - 82
ADDRESS 4215 Swallen Rd Evansville SIGNED Herbert Williams

*If additional space is needed to complete well log, use next consecutive numbered form.

ORIGINAL COPY – ODNR, DIVISION OF WATER, FOUNTAIN SQ., COLS., OHIO 43224

ATTACHMENT 2

cc:

Item #13

OhioEPA

DO NOT DESTROY! IMPORTANT

Mr. Carl F. Cavender
Canton Drop Forging
& Manufacturing Company
4575 Southway Street, S.W.
Canton, Ohio 44706

October 16, 1981

Dear Mr. Cavender:

Thank you for your letter and Petition of June 3, 1981 requesting an order of exemption under R.C. Section 3734.02(G) for a permit for the disposal of brick-bats, concrete, and wood pallets.

I believe that the brick-bats and concrete, as you have described them, do not meet the definition of "solid wastes" for the purpose of Ohio Administrative Code Chapter 3745-27. OAC Rule 3745-27-01(U) defines "solid wastes" for the purpose of the permit requirements. Specifically excluded from that definition are bricks and concrete from demolition operations that were affixed to the structure.

Since the brick-bats and concrete from your facility are materials from the demolition of the furnaces and floor, I believe that it is quite clear that they fall within the exclusions to "solid waste". Therefore, the disposal of the brick-bats and concrete are not subject to the permit requirements of OAC Chapter 3745-27.

However, I do not believe that the wooden pallets fall within the exclusions to "solid waste". As I understand the usage of the wood pallets, they are portable wood platforms used for the storage of materials. They are not part of the structure in the demolition process.

Since the wood pallets are of a sporadic and limited volume, I do not believe your proposed method of disposal would adversely affect the public health, safety, or the environment. Accordingly, I will issue Findings and Orders exempting the disposal of the wood pallets from the requirements of OAC Chapter 3745-27.

Item #14

If you have any questions, please feel free to contact myself or Ben L. Pfefferle III of my legal staff.

Sincerely yours,

Wayne S. Nichols

Wayne S. Nichols
Director

cc: Dan Redman
Stephen A. Reilly, Esq.

Solid Waste Disposal

OHIO ENVIRONMENTAL PROTECTION AGENCY

to Bill Everett for issue 10/9/81 Item #1

In the Matter of:

CANTON DROP FORGING
& MANUFACTURING COMPANY
4575 Southway Street, S.W.
Box 6902
Canton, Ohio 44706

Director's Final Findings and Orders

Pursuant to Ohio Revised Code Section 3734.02(G), the Director of Environmental Protection hereby makes the following Findings and issues the following Orders:

FINDINGS

1. The Canton Drop Forging & Manufacturing Company ("Applicant") operates a facility in Canton, Ohio.

2. On or about June 3, 1981 Applicant submitted a Petition to the Director of Environmental Protection requesting that demolished "brick-bats", "concrete", and "wood pallets" generated at Applicant's facility in Canton, Ohio be exempt from the permit requirements of R.C. Section 3734.02 and Ohio Adminstrative Code Chapter 3745-27.

3. Brick-bats are pieces of brick which result from the destruction of floors in Applicant's furnaces.

4. The concrete results from the destruction of the floors in Applicant's facilities.

5. The brick-bats and concrete are items affixed to the facility which are demolished.

6. The wooden pallets are not and have not been affixed to the structure and are not part of the demolished structure.

7. The volume of demolished brick-bats, concrete, and wood pallets is very small and generated sporadically.

8. The proposed disposal site for the demolished brick-bats, concrete, and wood pallets is adequate.

9. The brick-bats and concrete are part of the demolition of the structure and are not solid wastes for purposes of OAC Chapter 3745-27 and Revised Code Section 3734.02.

10. The wooden pallets are solid wastes for purposes of OAC Chapter 3745-27 and Revised Code Section 3734.02.

11. The proposed disposal of the wood pallets will not likely adversely affect the public health or safety or the environment.

ORDERS

1. Applicant is hereby ordered exempt from the provisions of OAC Chapter 3745-27 and Revised Code Section 3734.02 for the disposal of the wood pallets at its Canton facility.

Wayne S. Nichols
WAYNE S. NICHOLS
Director

Oct 15, 1981
Date

RECEIVED
JUN 16 1983
CANTON DROP FORGE

ATTACHMENT 3

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412160 **Customer: Canton Drop Forge**
4575 Southway St.
Date Received: 04/11/11 **Canton, OH 44706**
Date Sampled: 04/11/11
Time Sampled: 14:10
Project Name: Kimble
Identification: #1 Grab Waste Refractory
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	0.19 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	0.50 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	0.19 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	0.83 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	<0.002 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	0.12 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

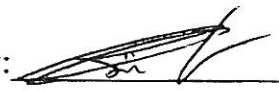
Approved By: 

CRYSTAL LABORATORIES

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412161 **Customer: Canton Drop Forge**
4575 Southway St.
Date Received: 04/11/11 **Canton, OH 44706**
Date Sampled: 04/11/11
Time Sampled: 14:15
Project Name: Kimble
Identification: #2 Grab Fly Ash
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	0.09 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	21.6 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	0.02 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	1.95 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	0.006 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	0.11 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: 

CRYSTAL ENVIRONMENTAL

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412163 **Customer: Canton Drop Forge**
4575 Southway St.
Date Received: 04/11/11 **Canton, OH 44706**
Date Sampled: 04/11/11
Time Sampled: 14:30
Project Name: Kimble
Identification: #4 Grab Floor Scrappings
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	5.04 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	0.25 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	0.33 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	0.78 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	<0.002 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: _____

CRYSTAL ENVIRONMENTAL

1201 Camden Ave, SW * Canton, Ohio 44706
Phone No: 330-454-4222

Laboratory No. 110412162 **Customer: Canton Drop Forge**
4575 Southway St.
Date Received: 04/11/11 **Canton, OH 44706**
Date Sampled: 04/11/11
Time Sampled: 14:30
Project Name: Kimble
Identification: #3 Grab Lime Cake
Sample Matrix: Solid

Analysis	Method	Results	Detection Limits	Date of Analysis
TCLP Arsenic	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Barium	1311/6010	1.90 mg/L	0.02 mg/L	04/14/11
TCLP Cadmium	1311/6010	0.32 mg/L	0.02 mg/L	04/14/11
TCLP Chromium	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11
TCLP Lead	1311/6010	0.60 mg/L	0.02 mg/L	04/14/11
TCLP Mercury	1311/7471	<0.002 mg/L	0.002 mg/L	04/14/11
TCLP Selenium	1311/6010	0.15 mg/L	0.02 mg/L	04/14/11
TCLP Silver	1311/6010	<0.02 mg/L	0.02 mg/L	04/14/11

Approved By: 

CHAIN - OF - CUSTODY

Company	CANTON DROP FORGE
Facility Name	" " "
City	CANTON
State	OHIO
Project Name	KIMBLE INFO
Project Contact	KEITH HOUSEKNECHT
Telephone #	330-477-4511
Client's Representative	"
Project Manager	"

CRYSTAL LABORATORIES, INC.
1201 CAMDEN AVE. S.W.
CANTON, OHIO 44706
(330) 454-4222

Item #	Sample # or Location	Date	Time	Sample Type	Sample Description	Sets or #'s of Containers	VOC	SVOC	BTEX / MTBE	GRO	DRO	TPH - 1664	RCRA Metals	TCLP Metals	WET CHEM	Other Analysis	Lab ID - #
1	~~WASTE~~ #1	11 APR 2011	1410	GRAB	WASTE REFRACTORY	1								X			11-1128-1
2	#2	"	1415	"	FLY ASH	1								X			1129-1
3	#3	"	1430	"	LIME CAKE	1								X			1129-2
4	#4	"	1445	"	FLOOR SCRAPPINGS	1								X			1129-3
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	

	Relinquished By	Accepted By	Date	Time
	K Houseknecht		4/11/11	3:15 PM

Remarks: PO # 11-1429

Temperature

Sampler's Signature:

ATTACHMENT 4

Ohio Department of Commerce
George V. Voinovich, Governor
Division of State Fire Marshal • Bureau of Underground Storage Tank Regulations
9221 Ravenna Road, Suite D7-D8 • Twinsburg, OH 44087 • (216) 425-9848
Nancy S. Chiles, Director

January 23, 1992

Rick Zollinger
800 William R. Day Building
121 Cleveland Avenue South
Canton, OH 44702-1921

RE: Canton Drop Forge
4575 Southway Southwest
Canton, OH 44706
Stark County
Incident #7600833-00

Dear Mr. Zollinger:

The State Fire Marshal, Bureau of Underground Storage Tank Regulations, (SFM, BUSTR) has received all required information regarding corrective actions of an underground storage tank (UST) release at the aforementioned location. Upon review of the analytical results and required reports, at this time BUSTR is not requiring further corrective actions of any contamination resulting from petroleum UST activity at the facility.

Due to information potentially not discovered or revealed, nothing in this letter should be interpreted as a guarantee or warrantee that no problems exist at the aforementioned location. In addition, this letter does not release the responsible party from future responsibility and liability under sections 3737.88 through 3737.89 of the Ohio Revised Code and other state laws and regulations or under the Federal Clean Water Act, Resource Conservation and Recovery Act, or Comprehensive Environmental Response, Compensation, and Liability Act for remedying conditions resulting from any release of contaminants to the environment.

If you have any questions about this determination, you can write to us at 9221 Ravenna Road, Suite D7, Twinsburg, Ohio 44087-2443, or telephone us at (216) 425-9848.

Sincerely,

Troy Schultz
Site Coordinator

TS/sk

cc: File #7600833-00
James Adams, Canton Health Department
Chief Fred Steffen, Perry Township Fire Department

ATTACHMENT 5

Ohio Department of Commerce
Division of State Fire Marshal
Bureau of Underground Storage Tank Regulation
6606 Tussing Road ▸ P.O. Box 687
Reynoldsburg, OH 43068-9009
(614) 752-7938 FAX (614) 752-7942
www.com.state.oh.us

Bob Taft
Governor

Gary C. Suhadolnik
Director

May 24, 1999

KEITH HOUSEKNECHT
CANTON DROP FORGE
PO BOX 6902
CANTON OH 44706

CANTON DROP FORGE
4575 SOUTHWAY ST SW
CANTON OH
STARK COUNTY
INCIDENT # 7600833-01

RE: NO FURTHER ACTION STATUS REGARDING CLOSURE REQUIREMENTS

Dear Mr. Houseknecht:

The Bureau of Underground Storage Tank Regulations (BUSTR) has reviewed all information submitted for this incident number. Based on this information, BUSTR requires no further action involving closure under Ohio Administrative Code 1301:7-9-12

Thank you for your cooperation. If you have any questions, please contact our office at (614) 752-7938.

Sincerely,

Kelly Gill
Corrective Actions Supervisor

KJG:anc

xc: Site File
Chief Thomas M Johnson, Canton Twp Fire Department